

ENVIRONMENTAL IMPACT REPORT

Project No. 526167 SCH No. 2017061040

PROJECT NAME: Morena Apartment Homes: General Plan Amendment, Community Plan Amendment, REZONE, Planned Development Permit, Site Development Permit, and Vesting Tentative Map, Municipal Code Amendment, and Local Coastal Program Amendment, to construct 150 market rate multifamily units with an approximately 4,400-square-foot clubhouse facility with leasing and exercise areas, recreational facility, landscaped areas including a pool and approximately 319-square-foot pool house building, and a water quality detention basin. The project would include a total of 267 vehicular parking spaces, including 99 attached garages, 52 detached carports, and 115 open parking spaces. Three handicap spaces would be accommodated on-site. In addition, 70 bicycle parking spaces and 16 motorcycle parking spaces are proposed. The project site consists of two parcels (Assessor Parcel Numbers 436-020-40 and -41). The project site is currently developed with the Coastal Trailer Villa Recreational Vehicle (RV) park. All existing uses would be removed and grading would occur on 5.73 acres of the 6.21-acre project site. Additionally, construction of the project would include a net import of approximately 1,300 cubic yards of soil in order to increase elevations and raise all portions of the project site on which housing would be constructed out of the 100-year floodplain. APPLICANT: Fairfield Realty III, LLC.

Update 8/21/2018:

Minor revisions have been made to the draft Environmental Impact Report (EIR). Added language would appear in a strikeout and underlined format. The EIR has been revised to reflect that a Land Development Code and Local Coastal Program Amendment for removal of Mobile Home Park Overlay Zone are part of the discretionary approvals that will be required to implement the Project. Additionally, per direction from the Native American Heritage Commission, clarifying language has been added to the Cultural Resources mitigation. The clarifying language will not result in any changes to the environmental impacts associated with the project or project mitigation measures. As such, no recirculation of the EIR is required. In accordance with the California Environmental Quality Act, Section 15073.5 (c)(4), the addition of new information that clarifies, amplifies, or makes insignificant modification does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated when there is identification of new significant environmental impact or the addition of a new mitigation measure required to avoid a significant environmental impact. Clarification of the discretionary actions required for implementation of the project will not result in any changes to the project, the

environmental impacts associated with the project or project mitigation measures. As such, no recirculation of the EIR is required.

ENVIRONMENTAL DETERMINATION:

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

Based on the analysis conducted for the project described above, the City of San Diego, as the Lead Agency, has prepared the following Environmental Impact Report. The analysis addressed the following issue area(s) in detail: Land Use (Noise), Transportation/Circulation), Noise, Historical Resources (Archaeology), Tribal Cultural Resources, and Paleontological Resources. The Environmental Impact Report concluded that the project would result in significant but mitigated environmental impacts to Land Use (Noise), Transportation/Circulation), Noise, Historical Resources (Archaeology), Tribal Cultural Resources, and Paleontological Resources. No significant and unmitigated impacts were identified. All other impacts analyzed in the draft EIR were determined to be less than significant.

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

PUBLIC REVIEW DISTRIBUTION:

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

State of California

Caltrans, District 11 (31)
State Clearinghouse (46A)
California Department of Transportation (51A)

City of San Diego

Mayor's Office (91)
Councilmember Bry, District 1 (MS 10A)
Councilmember Zapf, District 2 (MS 10A)
Councilmember Ward, District 3 (MS 10A)
Councilmember Cole, District 4 (MS 10A)
Councilmember Kersey, District 5 (MS 10A)
Councilmember Cate, District 6 (MS 10A)
Councilmember Sherman, District 7 (MS 10A)

Councilmember Alvarez, District 8 (MS 10A)

Councilmember Gomez, District 9 (MS 10A)

Development Services Department

EAS - Courtney Holowach

Transportation- Rudy Jauregui and Ann Gonsalves

Engineering – Hoss Florezabihi

Geology - Jacobe Washburn

Landscaping - Vanessa Kohakura

Planning Review - Kristal Feilen

Project Manager - Paul Godwin

Plan Historic-Sonnier Francisco

Planning Department

Long Range - Michael Prinz

Plan-Airport - Vickie White

Plan-Facilities Financing - Angela Abeyta

San Diego Police Department

Michael Pridemore (MS776)

San Diego Fire and Recue

Larry Trame (MS603)

Environmental Services Department

Lisa Wood (MS1102-A)

Central Library (81A)

Clairemont Branch Library (81h)

City Attorney (59)

Other Interested Groups. Organizations. and Individuals

San Diego Board of Realtors (154)

San Diego Chamber of Commerce (157)

Balboa Avenue Citizens Advisory Committee (246)

Clairemont Mesa Planning Committee (248)

San Diego Mesa College (250)

University of San Diego (251)

Clairemont Senior Citizens Club (252)

Tecolote Canyon Citizens Advisory Committee (254)

Friends of Tecolote Canyon (255)

Tecolote Canyon Rim (256)

Linda Vista Planning Group (267)

Clairemont Town Council (257)

San Diego Unified School District (132)

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Carmen Lucas (206)

South Coastal Information Center (21 0)

San Diego History Center (211)

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Ron Christman (215)

Clint Linton (215B)
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Native American Distribution (225A-S)
Fairfield Realty III, LLC
George Henderson
Julie McKane
Walter Deal

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.

Jeffrey Szymanski Senior Planner

Development Services Department

May 22, 2018

Date of Draft Report

August 21, 2018

Date of Final Report

Analyst: Courtney Holowach

Morena Apartment Homes Project Project No. 526167; SCH #2017061040

Letters of Comment and Responses

Letters of comment to the Draft EIR were received from the following agencies, organizations, and individuals. Several comment letters received during the Draft EIR public review period contained accepted revisions that resulted in changes to the Final EIR text. These changes to the text are indicated by strike-out (deleted) and underline (inserted) markings. The letters of comment and responses follow.

Α	State of California Governor's Office of Planning and Research	RTC-2
В	_	
C	San Diego County Archaeological Society, Inc.	
	Viejas Tribal Government	
	Henderson, George	
	Trapasso, Maria	

Letter A



STATE OF CALIFORNIA GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALE:

July 6, 2018

Courtney Holowach City of San Diego 1222 First Avenue, MS-501 San Diego, CA 92101

Subject: Morena Apartment Homes SCH#: 2017061040

Dear Courtney Holowach:

A-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 5, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

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

Sincerely

Scott Morgan Director, State Clearinghouse A-1 This comment lists the state agencies to whom the Draft EIR was submitted for review and indicates that no state agencies submitted comments to the State Clearinghouse by the close of public review. The comment also acknowledges that the City has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. No further response is required.

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044 1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov

Document Details Report State Clearinghouse Data Base

SCH# 2017061040

Project Title Morena Apartment Homes Lead Agency San Diego, City of

Type EIR Draft EIR

Description The project would include the construction of 150 market-rate multi-family units with an approx 4,400 sf clubhouse facility with leasing and exercise areas, recreational facility, landscaped areas including a pool and approx 319-sf pool house building, and a water quality detention basin. The project would include a total of 267 vehicular parking spaces, including 99 attached garages, 52 detached carports, and 115 open parking spaces. Three handicap spaces would be accommodated on-site. In addition, 70 bicycle parking spaces and 16 motorcycle parking spaces are proposed. The project site consists of two parcels. The project site is currently developed with the coastal trailer villa recreational vehicle park. All existing uses would be removed and grading would occur on 5.73 acres of the 6.21 acre project site. Additionally, construction of the project would include a net import of approx 1,300 cy of soil in order to increase elevations and raise all portions of the project site on which housing would be constructed out of the 100-year floodplain.

Lead Agency Contact

Name Courtney Holowach Agency City of San Diego Phone 619-446-5187

email

Address 1222 First Avenue, MS-501

City San Diego

State CA Zip 92101

Fax

Project Location

County San Diego City San Diego

Region

Lat / Long 32° 46' 34.67" N / 112° 12' 23.64" W Cross Streets Morena Blvd and Frankfort Street

Parcel No. 436-020-4000

Township

Range

Base

Proximity to:

Highways 5,8

Airports San Diego Intl

Railways Metro

Waterways Missing Bay, Pacific Ocean, San Diego River

Schools Saint Mary Magdeline School, Bay Park ES, Clairemont Emmauel PS,

Land Use coastal trailer villa recreational vehicle park/CC-4-2 and RS-1-7/Commercial employment, retail, &

services; residential

Project Issues Air Quality; Archaeologic-Historic; Flood Plain/Flooding; Geologic/Seismic; Noise; Traffic/Circulation; Water Quality; Growth Inducing; Aesthetic/Visual; Agricultural Land; Biological Resources; Cumulative Effects; Drainage/Absorption; Forest Land/Fire Hazard; Landuse; Minerals; Other Issues; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Tribal Cultural Resources; Vegetation; Water Supply; Wetland/Riparian

Section

Reviewing Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Cal Agencies Fire; Department of Parks and Recreation; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Regional Water Quality Control Board, Region 9; State Water Resources Control Board, Division of Drinking Water; State Water Resources Control Board, Division of Drinking Water, District 14; Native American Heritage Commission; Public Utilities Commission; State Lands

Note: Blanks in data fields result from insufficient information provided by lead agency.

	Commission: S	Docume State Cleari		Data Dase							
Date Received	05/22/2018	Start of Review 05/2	2/2018	End of Review	07/05/2018						
							1				
			*								
	Note: Blanks in	data fields result from in	sufficient inf	ormation provided	by load agency						



Letter B

401 B Street, Suite 800 San Diego, CA 92101-4231 (619) 699-1900 Fax (619) 699-1905 sandag.org July 5, 2018

File Number 3300300

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

Dear Ms. Holowach:

SUBJECT: Morena Apartment Homes Draft Environmental Impact Report (Project No. 526167)

Thank you for the opportunity to comment on the Morena Apartment Homes Draft Environmental Impact Report (DEIR). The San Diego Association of Governments (SANDAG) has reviewed the project from a regional perspective and with respect to San Diego Forward: The Regional Plan (2015 Regional Plan), which emphasizes the need for better land use and transportation coordination. SANDAG has determined that the project, which proposes to construct 150 multi-family units within walking distance of existing and planned high-frequency public transit, will help to implement the 2015 Regional Plan.

Smart Growth

SANDAG appreciates that the City of San Diego has prioritized transit-oriented development and land use changes in local plans that support the Smart Growth Concept Map and Regional Plan. A key goal of the 2015 Regional Plan is to focus growth in Smart Growth Opportunity Areas (SGOAs). Development in these areas supports a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all. This project is located in an Existing/Planned Mixed-Use Transit Corridor (SD CM-7), a SGOA identified on the Smart Growth Concept Map.

The proposed project currently is served by a high-frequency local bus route (Route 50). Several other transit services are planned for the project area, including a high-frequency local bus route (Route 105) and the Mid-Coast Trolley Extension. As stated in the Draft EIR, please continue to facilitate access to these transit services as a part of this project.

Transportation Demand Management

The Morena Apartment Homes are located within a short distance of the proposed Tecolote Road Trolley Station, which is included in the SANDAG Mid-Coast Mobility Hub Implementation Strategy. Mobility hubs incorporate shared mobility services, amenities, and technologies that enhance access to

- B-1 This comment describes the overall purpose of the 2015 Regional Plan and states that the project would help to implement the 2015 Regional Plan. It does not raise an issue related to the adequacy of the analysis contained within the EIR, but rather provides support for the project's approval.
- B-2 See response to comment B-1.
- B-3 As discussed in Section 4.6.6 of the EIR, the project's residential densities would be supportive of the future trolley station along Tecolote Road and would not conflict with the existing or future transit facilities. The project has been designed to be conducive to resident and visitor use of transit, considering both existing and planned transit opportunities.
- B-4 As discussed in Section 4.15.5 of the EIR, the project would be consistent with the City's Climate Action Plan (CAP) Checklist, and specifically comply with Strategy 3 of the CAP Checklist related to bicycling, walking, transit, and land use. The project would promote walkability by installing new accessible sidewalks along the project frontage along West Morena Boulevard, Morena Boulevard, and Frankfort Street. Internal walkways are provided throughout the project site providing access to on-site amenities and providing pedestrian connections to the surrounding roadways. The main pedestrian access point including an accessible ramp would be at the corner of Morena Boulevard and Frankfort Street. An additional pedestrian walkway provides access to Morena Boulevard near the right-in/right-out driveway. These pedestrian connections would facilitate future resident use of the surrounding transit opportunities including use of bus route 105 with a stop located at the project frontage at Morena Boulevard and use of the future trolley stop associated with the blue line extension at Tecolote Road, thereby enhancing access to transit stations and reduce reliance on the private automobile.

MEMBER AGENCIES Cities of Carlsbad Chula Vista Coronado Del Mar

> El Cajon Encinitas Escondido Imperial Beach La Mesa Lemon Grove National City Oceanside

> > Poway San Diego San Marcos Santee Solana Beach

Vista and County of San Diego

ADVISORY MEMBERS Imperial County California Department of Transportation

B-3

Metropolitan
Transit System

North County

United States Department of Defense

Unified Port District

B-4

B-1

B-2

San Diego County Water Authority

Southern California Tribal Chairmen's Association

Mexic

San Diego

B-5	transit stations and reduce reliance on the private automobile. In support of the mobility hub concept, the Morena Apartment Homes could support transportation demand management (TDM) programs and services that connect tenants to the future Tecolote and Clairemont Trolley Stations and help to reduce traffic and parking demand associated with the proposed land use changes. TDM strategies to consider include: Provision and promotion of shared mobility services (e.g., carshare, bikeshare, scootershare) to residents. Shared mobility services provide an amenity to residents, enhancing connections to the future Trolley station, recreational areas, and other community destinations. Reducing parking requirements or unbundling parking, given the proximity to regional transit	B-5	Transportation management measures are included in the project CAP Checklist and discussed in detail in Section 4.15.5 of the EIR.
	services.		
	 Offering subsidized transit passes to residents to encourage transit ridership. 		
B-6	iCommute, the SANDAG TDM program, provides regional TDM services that encourage the use of transportation alternatives. Regional TDM programs that can be promoted to tenants include the regional vanpool program subsidy, the Guaranteed Ride Home service, and support for bicycling, carpool, and transit. Information on iCommute can be accessed at iCommuteSD.com. Additional information on the Mid-Coast Mobility Hub Implementation Strategy is available at SDForward.com/MidCoastMobilityHubs.	B-6	This comment's identification of the iCommute program is noted. See responses to comments B-4 and B-5.
	Other Considerations	B-7	The comment's identification of additional SANDAG programs is
B-7	SANDAG has additional resources that can be used for added information or clarification on topics discussed in this letter. The following can be found at sandag.org:		noted.
	Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region		
	 Integrating Transportation Demand Management into the Planning and Development Process – A Reference for Cities 		
B-8	When available, please send any additional environmental documents related to this project to: Intergovernmental Review c/o SANDAG 401 B Street, Suite 800 San Diego, CA 92101 We appreciate the opportunity to comment on the City of San Diego's Morena Apartment Homes	B-8	The City will continue to provide documents to SANDAG as requested.
	DEIR. If you have any questions, please contact me at (619) 595-5609 or katie.hentrich@sandag.org.		
	Sincerely, KATIL ACCURATION KATIE HENTRICH Regional Planner KHE/kwa		

Letter C



San Diego County Archaeological Society, Inc.

Environmental Review Committee

17 June 2018

To:

Ms. Courtney Holowach

Development Services Department

City of San Diego

1222 First Avenue, Mail Station 501 San Diego, California 92101

Subject:

Draft Environmental Impact Report

Morena Apartment Homes Project No. 526167

Dear Ms, Holowach:

C-1 I have reviewed the historical resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its historical resources appendix, we concur with the impact analysis and that no significant impacts to such resources are likely to exist.

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

Sincerely,

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

cc:

RECON

SDCAS President

File

C-1 Comment noted.

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

Letter D



PO Box 908 Alpine, CA 91903 #1 Viejas Grade Road Alpine, CA 91901

> Phone: 619445.3810 Fax: 619445.5337

May 31, 2018: gone depart agent to strate of the rate on the engine additional of

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

RE: Morena Apartment Homes Project

Dear Ms. Holowach,

- D-1 The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas.
- D-2 Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.
- D-3 Please call me at 619-659-2312 or Ernest Pingleton at 619-659-2314 or email, rteran@viejas-nsn.gov or epingleton@viejas-nsn.gov , for scheduling. Thank you.

Sincerely

Ray Teran, Resource Management VIEJAS BAND OF KUMEYAAY INDIANS

- D-1 For a discussion on anticipated cultural resource impacts, see Section 4.4 of the EIR. For a discussion on anticipated tribal cultural resource impacts, see Section 4.5 of the EIR.
- D-2 As discussed in Section 4.4.4(b) and 4.5.4 of the EIR, the project area is located within an area identified as sensitive on the City of San Diego Historical Resources Sensitivity Maps. As such, archaeological and Native American monitoring during grading activities is a mitigation measure identified in the EIR.
- D-3 Comment noted.

Letter E George Henderson < george.henderson@gmail.com> From: Thursday, June 14, 2018 4:06 PM Sent: To: DSD EAS Subject: Morena Apartment Homes Project# 626167 Courtney Holowach Environmental Planner. City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101 Good Afternoon. E-1 Comment noted. Last year you published a "Notice of Preparation of n Environmental Impact Report" for the referenced project. On July E-1 17, 2017 I submitted a letter of written comments. I now believe that the developer has adequately addressed the both issues which were raised in that letter. I withdraw those objections. Sincerely, George Henderson 3151 Driscoll Drive San Diego, CA 92117

Letter F

From: mtsos@sbcglobal.net

Sent: Thursday, May 24, 2018 3:07 PM

To: DSD EAS

Subject: Morena Apartment Homes Project No. 526167

F-1 Have any of you in the Planning/Development Services Dept driven on Morena Blvd? West Morena and Morena meet at the location in question. That stretch of Morena Blvd is at a standstill most days. This project will create more gridlock, as it's a two lane road that has a very active gas station on the two corners. 150 apts with 2 autos each is an extra 300 to 600 cars added to the gridlock each day.

Thanks for listening,

Maria Trapasso Clairemont resident F-1 A Transportation Impact Analysis was conducted for the project, the results of which are discussed in Section 4.6 of the EIR. The Traffic Impact Analysis assessed six intersections and seven roadway segments, all of which could be potentially impacted by the project.

As discussed in Section 4.6.4.2 of the EIR, impacts to the six study area intersections are expected to be less than significant under the Existing Plus Project, Near-Term Plus Project, and Year 2035 Plus Project scenarios.

As discussed in Section 4.6.4.2 of the EIR, the project would result in significant impacts to two roadway segments: Morena Boulevard, from Frankfort Street to Knoxville Street, and Morena Boulevard, from Knoxville Street to Tecolote Road. The EIR identified mitigation which would require installation of an adaptive signal control system at three intersections along West Morena Boulevard, which would reduce the significant impact to these roadway segments to a less than significant level.

Final Environmental Impact Report for the Morena Apartment Homes Project San Diego, California Project No. 526167

SCH #2017061040

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- A: Notice of Preparation and Comments
- B: Assessment of Environmental Noise
- C: Potential Historical Resource Review
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- E: Phase I Environmental Site Assessment
- F-1: Drainage Report
- F-2: Draft CLOMR-F
- G: Storm Water Quality Technical Report
- H-1: Geotechnical Study
- H-2: Geotechnical Study Addendum dated 06/23/17
- H-3: Geotechnical Study Addendum dated 08/28/17
- I: Sewer Report
- J: Waste Management Plan
- K: CAP Consistency Checklist
- L: Air Quality Analysis

List of Abbreviated Terms

°F degrees Fahrenheit

μg/m3 micrograms per cubic meter
AAQS Ambient Air Quality Standards

AB Assembly Bill

ACC Advanced Clean Cars

ACM asbestos-containing materials
ADD Assistant Deputy Director
ADT average daily traffic
AFY acre-feet per year

AlA Airport Influence Area

ALUC Airport Land Use Commission
ALUCP Airport Land Use Compatibility Plan

AMSL above mean sea level

AQIP Air Quality Improvement Program

BAU business as usual Building Inspector

BMP best management practice C&D Construction and Demolition

CAA Clean Air Act

CAAQS California Ambient Air Quality Standards

CAFÉ Corporate Average Fuel Economy

CAL FIRE California Department of Forestry and Fire CalEEMod California Emissions Estimator Model CALGreen California Green Building Standards Code Caltrans California Department of Transportation

Cal-OSHA California Occupational Safety and Health Administration

CAP Climate Action Plan

CAPCOA California Air Pollution Control Officers Association

CARB California Air Resources Board

CBC California Building Code

CEC California Energy Commission

CEQA California Environmental Quality Act

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CFC California Fire Code

CFR Code of Federal Regulations

cfs Cubic feet per second

CHRIS California Historic Resources Information System

CH₄ Methane

City City of San Diego

CLOMR-F Conditional Letter of Map Revision based on Fill

CLUP Comprehensive Land Use Plan

CM Construction Manager

CMCP Clairemont Mesa Community Plan
CNEL Community Noise Equivalent Level

CO Carbon monoxide CO₂ Carbon dioxide

CRHR California Register of Historic Resources

CSVR Consultant Site Visit Record

CTC California Transportation Commission

CWA Clean Water Act

dB decibel

dB(A) A-weighted decibels

DIF Development Impact Fees
DPM diesel particulate matter

EAS Environmental Analysis Section
EIR Environmental Impact Report
EMS Emergency Medical Services

EO Executive Order

EPA U.S. Environmental Protection Agency

ESA Environmental Site Assessment
ESD Environmental Services Department
ESL Environmentally Sensitive Lands
FAA Federal Aviation Administration

FEMA Federal Emergency Management Agency

FIRM Flood Insurance Rate Map
FTA Federal Transit Administration

GHG greenhouse gas

GPA General Plan Amendment GWP global warming potential

gdp gallons per day

HCM Highway Capacity Manual
HERS Home Efficiency Rating System
HRG Historic Resources Guidelines

I-5 Interstate 5

ITE Institute of Transportation Engineers
ITS Intelligent Transportation Systems

LCFS Low Carbon Fuel Standard

LCP Local Coastal Plan

LDC Land Development Code
LDM Land Development Manual

LED Light-emitting device

Leq Average sound level

LEV III Low Emission Vehicle III

LID Low Impact Development

LOMR Letter of Map Revision

LOS Level of Service

LOSSAN Los Angeles-San Diego-San Luis Obispo

LRT light rail transit

LVCP Linda Vista Community Plan

MBAP Morena Boulevard Station Area Planning Study

MHPA Multi-Habitat Planning Area

MMC Mitigation Monitoring Coordination

MMRP Mitigation Monitoring and Reporting Program

MMT CO₂E million metric tons of CO₂ equivalent

mpg miles per gallon mph miles per hour

MPO Metropolitan Planning Organization
MSCP Multiple Species Conservation Program
MS4 Municipal Separate Storm Sewer System

MT CO₂E metric tons of CO₂ equivalent MTS Metropolitan Transit System

MWD Metropolitan Water District of Southern California

N₂O Nitrous oxide

NAAQS National Ambient Air Quality Standards
NAHC Native American Heritage Commission
NFIP National Flood Insurance Program

NO₂ nitrogen dioxide NOP Notice of Preparation NO_y oxides of nitrogen

NPDES National Pollutant Discharge Elimination System

NRHP National Register of Historic Places

OEHHA Office of Environmental Health Hazard Assessment
OSHA Occupational Safety and Health Administration

Pb lead

PDP Planned Development Permit

PI Principal Investigator

PIRD Planned Infill Residential Development

PM₁₀ particulate matter less than 10 microns in diameter PM_{2.5} particulate matter less than 2.5 microns in diameter

PME Paleontological Monitoring Exhibit

ppm parts per million

PRC Public Resources Code
Project Morena Apartment Homes
PUD Public Utilities Department
RAQS Regional Air Quality Strategy
RCP Regional Comprehensive Plan

RE Resident Engineer

Regional Plan San Diego Forward: The Regional Plan

ROG Reactive organic gas

RPS Renewable Portfolio Standard RTP Regional Transportation Plan

RV recreational vehicle

RWQCB Regional Water Quality Control Board SANDAG San Diego Association of Governments

SARA Superfund Amendments and Reauthorization Act

SB Senate Bill

SCH State Clearinghouse

SCS Sustainable Communities Strategy

SDAB San Diego Air Basin

SDAPCD San Diego Air Pollution Control District

SDCRAA San Diego County Regional Airport Authority

SDCWA San Diego County Water Authority

SDFD San Diego Fire Department SDG&E San Diego Gas & Electric

SDIA San Diego International Airport
SDMC San Diego Municipal Code
SDPD San Diego Police Department

SDP Site Development Plan

SDUSD San Diego Unified School District

SFHA Special Flood Hazard Area

SHPO State Historic Preservation Office

SIP State Implementation Plan

SO₂ sulfur dioxide

SoCalGas Southern California Gas Company

SOx Sulfur oxides

STC sound transmission class

SWQMP Storm Water Quality Management Plan SWRCB State Water Resources Control Board

TAC toxic air contaminants

TCM transportation control measures

TDM Transportation Demand Management

TIA Transportation Impact Analysis

TMDL total maximum daily load

TPA Transit Priority Area

TWLTL two-way left-turn lane

UD Urban Design

UTC University Town Center U.S.C. United States Code v/c volume to capacity

VdB vibration level in decibels

VHFHSZ very high fire hazard severity zone

VOC volatile organic compounds

VTM Vesting tentative map WMP Waste Management Plan

WQIP Water Quality Improvement Plan



Executive Summary

S.1 Project Synopsis

This summary provides a brief synopsis of: (1) the Morena Apartment Homes Project, (2) the results of the environmental analysis contained within this Environmental Impact Report (EIR), (3) the alternatives to the project that were considered, and (4) the major areas of controversy and issues to be resolved by decision makers. This summary does not contain the extensive background and analysis found in the document. Therefore, the reader should review the entire document to fully understand the project and its environmental consequences.

S.1.1 Project Location and Setting

The project is located in the southwestern portion of the Clairemont Mesa Community Plan (CMCP) area, just east of Mission Bay Park and Interstate 5 (I-5) and approximately 5 miles north of Downtown San Diego. The 6.21-acre project site consists of two parcels, and is located at the northeast corner of the West Morena Boulevard/Morena Boulevard intersection, east of I-5 and north of Tecolote Road. The site contains a 90-unit recreational vehicle (RV) park. The RV park is accessed from two driveways, one from Morena Boulevard and one from Frankfort Street.

S.1.2 Project Description

S.1.2.1 Development Summary

The project includes removal of the existing Coastal Trailer Villa RV park and construction of 150 multi-family residences (apartments) with on-site amenities that would be available to rent. The apartments would be developed at a density of 26.3 dwelling units per acre and would be accommodated in nine, three-story buildings surrounded by a landscape perimeter and private and common open space areas for residents. Building heights would be within allowable height limits

(30 feet). The site would contain private on-site recreational amenities including a clubhouse, fitness center, and a pool.

Parking would be provided on-site, and would include 267 vehicle spaces including 1 accessible space, 70 bicycle parking spaces, and 16 motorcycle spaces. Vehicle access to the project site would be from a driveway on Frankfort Street, at the same location as the existing Frankfort Street access driveway. A right-in/right-out only driveway would also provide site access from Morena Boulevard, in the same location as the existing northernmost driveway. The main pedestrian access point would be at the corner of Morena Boulevard and Frankfort Street. Internal walkways would be provided throughout the project site, providing access to on-site amenities and providing pedestrian connections to the surrounding roadways. Utility infrastructure for water, wastewater, storm drain, and utility service would be provided within the site, connecting to existing lines under Morena Boulevard and Frankfort Street.

S.1.2.2 Discretionary Actions

The project would require: a General Plan Amendment to amend the Land Use and Street System Map to identify the site as entirely Residential; a Community Plan Amendment to amend the CMCP to remove the mobile home park overlay and apply a medium density residential (15 to 30 dwelling units per acre) designation to the project site; a rezone to change the existing zoning of CC-4-2 and RS-1-7 to a residential–multiple unit (RM-2-5) zone; a Land Development Code and Local Coastal Program Amendment for removal of the Mobile Home Park Overlay Zone; a Planned Development Permit to allow proposed deviations from applicable zone regulations; a Site Development Permit due to the presence of Environmentally Sensitive Lands within the site; and a Vesting Tentative Map to create a 150 condominium map. Individual units would be offered for rent, not for individual sale.

S.1.3 Project Objectives

In accordance with CEQA Guidelines Section 15124, the following primary objectives support the purpose of the project, assist the lead agency in developing a reasonable range of alternatives to be evaluated in this report, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary. The specific objectives for the project are:

- Provide housing to accommodate increasing growth in the region.
- Enhance the visual character of the site as viewed from Morena Boulevard.
- Provide development that is consistent with the City of Villages and Smart Growth principles.
- Develop the site consistent with the scale and character of development in the surrounding area and the CMCP area.

S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

Table S-1 summarizes the significant impacts identified through the environmental analysis completed for the project. Table S-1 also identifies the mitigation measures that would reduce and/or avoid the environmental effects as feasible, with a conclusion as to whether the impact would be mitigated to below a level of significance or if impacts would remain significant and unavoidable. Further discussion of potential and anticipated environmental impacts is detailed in Chapter 4.0.

S.3 Areas of Controversy

As discussed throughout the EIR, the significant impacts associated with environmental resources would be mitigated to less than significant levels, and no significant areas of controversy associated with environmental resource impacts have been identified.

However, one area of controversy is the requirement for a Community Plan Amendment to allow for higher residential densities than currently allowed under the existing CMCP. Although it is anticipated that higher density land uses would ultimately be approved as part of a comprehensive CMCP update, this project proposes a stand-alone Community Plan Amendment to allow higher density residential development in advance of the CMCP update. Other commenters have raised concerns about the compatibility of the project and proposed densities with community character.

S.4 Issues to be Resolved by the Decision-Making Body

The issues to be resolved by the decision-making body (in this case the City Council) are whether: (1) the significant impacts associated with land use, noise, paleontological resources, cultural resources, traffic, and tribal cultural resources would be fully mitigated to below a level of significance, (2) to approve a proposed alternative instead of the project, and (3) how to reduce significant and unavoidable environmental impacts to the maximum extent feasible while achieving project objectives, through adoption of mitigation measures and/or a project alternative identified in this EIR.

S.5 Project Alternatives

The California Environmental Quality Act (CEQA) Guidelines Section 15126.6 requires that an EIR compare the effects of a "reasonable range of alternatives" to the effects of a project. The alternatives selected for comparison should be those that would attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project. The "range of alternatives" is governed by the "rule of reason," which requires the EIR to set forth only those

alternatives necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time while also taking into account economic, environmental, social, technological, and legal factors. In developing the alternatives to be addressed in this section, consideration was given to their ability to meet the basic objectives of the project and eliminate or substantially reduce significant environmental impacts. Three alternatives were identified for the project that would provide a reasonable range of alternative that would achieve this goal, which includes:

- Alternative 1: No Project (No Development) Alternative: This alternative is the circumstance under which no development would occur and the project site would remain as its existing use.
- Alternative 2: Current Plan Alternative: Because the project requires a Community Plan Amendment and Rezone, this alternative is the circumstance under which the project site would be developed consistent with the existing Community Plan and Zoning designations.
- Alternative 3: Relocated Community Open Space Alternative: This alternative is the scenario
 under which the project redesigns the interior layout of its component parts, placing the
 pool and community open space at the entrance of the project.

S.5.1 No Project (No Development) Alternative

The No Project (No Development) Alternative would maintain the site as its current use as a RV park and would maintain the other existing structures and uses on the project site including two duplexes, two single-family residences, and outdoor storage of trucks and RVs. Implementation of this alternative would not meet any of the project objectives, as no development, and thus no change to the project site, would occur. This alternative would result in impact levels that would be less than those anticipated for the project in regards to noise, paleontological resources, cultural resources, tribal cultural resources, traffic and circulation, health and safety/hazardous materials, air quality, and greenhouse gas emissions. Impacts associated with visual effects and neighborhood character, hydrology, and water quality would be greater under this alternative as compared to the project. Impacts associated with land use, geology and soils, public services, and utilities would be the same under this alternative as compared to the project. Should the No Project (No Development) Alternative be implemented, the project's potentially significant impacts associated with cultural resources, noise, tribal cultural resources, and paleontological resources would not occur. While adoption of the No Project (No Development) Alternative would maintain the existing condition of the site, impacts associated with Noise Element compatibility (land use) and Neighborhood Character would be greater than the project.

S.5.2 Current Plan Alternative

The Current Plan Alternative is the circumstance under which the project site would be developed consistent with the existing General Plan and Zoning designations. The Current Plan Alternative would construct a total of 24 single-family lots, and an additional 17,500 square feet of commercial and 15 multi-family apartments would be constructed within two 2-story buildings. This alternative

would also include internal streets and parking to accommodate the residential and commercial uses. Implementation of the Current Plan Alternative would meet the project objectives, in that the Current Plan Alternative would result in the construction of housing to accommodate growth within the region, although housing would be provided to a lesser extent (111 fewer units).

Impacts associated with traffic and circulation, air quality, and greenhouse gas emissions would be greater under this alternative as compared to the project. Impacts associated with land use, noise, paleontological resources, cultural resources, tribal cultural resources, visual effects and neighborhood character, health and safety/hazardous materials, hydrology, water quality, geology and soils, public services, and utilities would be the same under this alternative as compared to the project.

This alternative would increase the number of average daily traffic (ADT) due to the commercial component, resulting in incrementally greater impacts to traffic, air quality, and greenhouse gas emissions when compared to the project. This alternative would not meet the project objectives focused on providing adequate housing to accommodate increasing growth in the region, and providing transit supportive development and connections to transit along the Morena Boulevard corridor to the same degree as the project.

S.5.3 Relocated Community Open Space Alternative

The Relocated Community Open Space Alternative would be similar to the project with the same number of multi-family residential units on the project site (150 units); however, the buildings would be oriented with the three-story multi-family structures and tuck under garages adjacent to Morena Boulevard and the community open space and pool areas located internal to the project site, closer to Frankfort Street. All other project features would be the same as the project with similar main access points, parking, landscaping, and open space. The Relocated Community Open Space Alternative would meet all project objectives, although to a lesser extent than the project. The open space was sited in its location under the proposed project at the request of community members to reduce the scale of the project at the frontage and enhance the visual character and consistency with the surrounding community. Thus, this alternative could reduce the visual compatibility of the project in relation to the surrounding roadways and community. However, this alternative would reduce impacts to land use (noise compatibility) due to the relocation of usable outdoor open space internal to the project site where building attenuation would increase noise compatibility with these outdoor uses. Based on the analysis conducted in Chapter 9, Alternatives, it has been determined that the Relocated Open Space Alternative would be considered the Environmentally Superior Alternative for its ability to reduce outdoor noise levels at the community open space.

		ble S-1 าvironmental Analysis Results	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project result in a conflict with the environmental goals, objectives, or recommendations of the General/Community Plan in which it is located?	While the project requires a General Plan Amendment, Community Plan Amendment, and Rezone to allow for development of 150 apartment homes, the proposed land use changes would not conflict with environmental goals, objectives, or recommendations of the General Plan or Clairemont Mesa Community Plan (CMCP), as discussed in EIR Section 4.1.4.1 and Table 4.1-1. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the project require a deviation or variance, and would the deviation or variance in turn result in a physical impact on the environment?	The project would require deviations from certain development regulations including the Environmentally Sensitive Lands Regulations, retaining wall height and setback regulations and dimensions for outside assigned unit storage. As detailed in Section 4.1.5.1, none of the proposed deviations would result in a physical impact on the environment. The deviation from the Environmentally Sensitive Lands regulations would increase elevations of those portions of the project site within the floodplain to eliminate a Special Flood Hazard Area condition. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?	The project site does not contain Multi-Habitat Planning Area (MHPA) lands, nor is it directly adjacent to any MHPA lands. Furthermore, the site is entirely developed and no other local, regional, or state conservation plan has identified the project site for preservation. Therefore, the project would not conflict with the City's MSCP Subarea Plan or any other approved local, regional, or state habitat conservation plans. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the project physically divide an established community?	The project does not include any features that would have the potential to physically divide an established community. No impact would occur.	No impact would occur. No mitigation is required.	No Impact

		ble S-1 nvironmental Analysis Results	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project result in land uses which are not compatible with an adopted airport Comprehensive Land Use Plan?	Implementation of the project would not result in incompatible uses as defined in an airport land use plan or be inconsistent with an Airport Land Use Compatibility Plan (ALUCP). The project would be compatible with the San Diego International Airport (SDIA) ALUCP. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the proposal result in the	a. Noise Element	LU-1: Interior Noise	Less than
exposure of sensitive receptors to current or future noise levels that would exceed standards established in the Noise Element of the General Plan or an adopted ALUCP?	The project would expose people to interior noise levels in excess of the 45 community noise equivalent level (CNEL) standards established in the Noise Element of the General Plan for interior noise levels, resulting in a significant impact that would be mitigated through implementation of mitigation measure LU-1. The project would be consistent with the Noise Element requirements for outdoor use areas with the installation of the 6-foot-high barrier around the recreation/pool area, which is included as part of the project design. Thus, impacts related to outdoor noise would not conflict with the General Plan, and impacts would be less than significant. b. Airport Noise Compatibility The project is outside of the SDIA ALUCP 60 CNEL contour and would not result in exposure of people to current or future airport noise in excess of compatibility standards. Impacts related to airport noise compatibility would be less than significant.	 Prior to issuance of a building permit, the project applicant shall provide evidence to the City to demonstrate that buildings will achieve a 45 CNEL interior noise level. Interior noise levels of the habitable residential spaces were calculated based on typical dimensions for similar projects of this type. The project could reach acceptable interior noise levels for all three zone based on use of the following window/door ratings: Zone A: Utilizing sound transmission class (STC) 40 glazing would result in interior noise levels ranging from 41-45 CNEL. Zone B: Utilizing STC 35 glazing would result in interior noise levels ranging from 41-45 CNEL. Zone C: Utilizing STC 30 glazing would result in interior noise levels ranging from 40-45 CNEL. Remaining Façades: No requirement by code but STC 30 glazing is recommended and would result in interior noise levels ≤45 CNEL. STC 30 glazing would be required at the recreation building in order to meet California Green Building Standards Code (CALGreen) interior noise standards at non-residential spaces. 	Significant
Noise			
Would the project result in or create a significant increase in the existing ambient noise levels which exceed the City's adopted ordinances or thresholds?	a. Construction Noise Construction activities would temporarily increase ambient noise levels in the project vicinity. Project construction would potentially generate noise levels up to 78 A-weighted decibels [dB(A)] at sensitive receptor locations surrounding the project site, which would exceed the City's Municipal Code noise limit of 75 dB(A). The highest noise levels would occur during the site preparation and grading phases. Construction noise in excess of the City's Municipal Code noise limit would be considered a significant impact, and would be mitigated through implementation of mitigation measure NOI-1.	 NOI-1: Construction Noise Adherence to the following measures would reduce construction noise levels at adjacent properties to acceptable levels. Site preparation and grading phases should be scheduled to limit the number of heavy construction machines operating simultaneously. Install a temporary construction noise barrier at the northern, southern, and eastern property lines of the project site in order to reduce the noise impacts to the residential uses. The barrier should block the line of sight from the noise source to the receiver and have no holes or gaps. The minimum density should be 2 pounds per square foot. Limit construction activity to the hours of 7:00 a.m. to 7:00 p.m. 	Less Than Significant

		ble S-1 vironmental Analysis Results	
Environmental Issue	Results of Impact Analysis b. Ground-borne Vibration	Mitigation Schedule highest noise-generating activity and construction activity away from	Impact Level After Mitigation
	Project construction is not expected to require the use of vibration producing equipment. Additionally, train activity associated with the Los Angeles-San Diego-San Luis Obispo rail corridor would generate vibration levels below Federal Transit Administration criteria. Thus, impacts related to ground-borne vibration would be less than significant.	 Equip internal combustion engine-driven equipment with original factory (or equivalent) intake and exhaust mufflers which are maintained in good condition. Prohibit and post signs prohibiting unnecessary idling of internal combustion engines. Locate all stationary noise-generating equipment such as air compressors and portable generators as far as practicable from noise-sensitive land uses. Utilize "quiet" air compressors and other stationary equipment where feasible and available. Designate a noise disturbance coordinator who would respond to neighborhood complaints about construction noise by determining the cause of the noise complaints and require implementation of reasonable measures to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site. 	
	c. Operational Noise The project would not result in operational noise impacts associated with traffic noise, as project traffic would result in a noise increase of 0.2 CNEL, which is below the significance threshold of a 3.0 CNEL increase in noise. Operational traffic noise impacts would be less than significant. Mechanical equipment, including split-system outdoor	NOI-2: Mechanical Equipment Siting and Screening Prior to approval of building permits, the applicant shall demonstrate on building plans that the residential split-system condensing units (air conditioning units) are located a minimum of 60 feet from the closest single-family residential property line or shall provide acoustical screening between the unit and the property line.	Less Than Significant
	condensing units (air conditioning units), would be a primary stationary noise source associated with the project. As detailed in the noise report (Appendix B), noise from residential split-system condensing units could reach a power level sound of 75 dB(A), thereby exceeding the nighttime single-family residential property line limit of 40 dB(A), resulting in a potentially significant impact, and would be mitigated through implementation of mitigation measure NOI-2 .		
Paleontological Resources			
Would the project require over 1,000 cubic yards of excavation at a depth greater than 10 feet in a high resource potential geologic deposit/formation/rock unit, or require over 2,000 cubic yards of excavation at a depth greater than 10 feet in a moderate resource	The project would require grading (cut) at the higher elevations of the site near Tonopah Avenue. The geology underlying the site near Tonopah Avenue is underlain by Bay Point Formation at a depth of approximately 4 feet. In this location, grading may occur up to a depth of 9 feet and would have the potential to impact Bay Point Formation, which has a high potential for paleontological resources. Thus, although	 PALEO-1: Paleontological Monitoring I. Prior to Permit Issuance A. Entitlements Plan Check 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction 	Less Than Significant

		ole S-1 vironmental Analysis Results	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
potential geologic deposit/formation/rock unit (unless sensitive geologic formations are present at a shallower depth)?	grading depth would not exceed 10 feet per the City's significance threshold, implementation of the project has the potential to result in significant impacts to paleontological resources due to shallow grading that may affect Bay Point Formation. Impacts to paleontological resources would be considered a significant impact, and would be mitigated through implementation of mitigation measure PALEO-1.	meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents. B. Letters of Qualification have been submitted to ADD 1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines. 2. MMC will provide a letter to the applicant confirming the qualifications of the Pl and all persons involved in the paleontological monitoring of the project. 3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program. II. Prior to Start of Construction A. Verification of Records Search 1. The Pl shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the Pl stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. B. Pl Shall Attend Precon Meetings 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the Pl, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor. a. If the Pl is unable to attend the Precon Meeting, the Applicant shall schedule a	

	Summary of Significan	Table S-1 It Environmental Analysis Results	
			Impact Leve
Environmental Issue	Results of Impact Analysis	Mitigation	After Mitigati
		shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).	
		3. When Monitoring Will Occur	
		a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.	
		b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.	
		III. During Construction	
		A. Monitor Shall be Present During Grading/Excavation/Trenching	
		1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the PME.	
		2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.	
		3. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.	
		B. Discovery Notification Process	
		 In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate. 	
		The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.	

	Table S-1 Summary of Significant Environmental Analysis Results				
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation		
Environmental 133de	Results of impact / italysis	3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.	Auter Mingadon		
		C. Determination of Significance			
		1. The PI shall evaluate the significance of the resource.			
		 a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI. 			
		 b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. 			
		c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.			
		d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.			
		IV. Night and/or Weekend Work			
		A. If night and/or weekend work is included in the contract			
		 When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 			
		2. The following procedures shall be followed.			
		a. No Discoveries			
		In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8 a.m. on the next business day.			
		b. Discoveries			
		All discoveries shall be processed and documented using the existing procedures detailed in Section III - During Construction.			
		c. Potentially Significant Discoveries			
		If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.			

	Table S-1 Summary of Significant Environmental Analysis Results				
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation		
	·	d. The PI shall immediately contact MMC, or by 8 a.m. on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.			
		B. If night work becomes necessary during the course of construction			
		 The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 			
		2. The RE, or BI, as appropriate, shall notify MMC immediately.			
		C. All other procedures described above shall apply, as appropriate.			
		V. Post Construction			
		A. Preparation and Submittal of Draft Monitoring Report			
		 The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring, 			
		 For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report. 			
		b. Recording Sites with the San Diego Natural History Museum			
		The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.			
		MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.			
		3. The PI shall submit revised Draft Monitoring Report to MMC for approval.			
		4. MMC shall provide written verification to the PI of the approved report.			
		MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.			
		B. Handling of Fossil Remains			
		 The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued. 			
		 The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate 			

Table S-1 Summary of Significant Environmental Analysis Results				
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigatio	
		C. Curation of fossil remains: Deed of Gift and Acceptance Verification	Less Than Significant	
		 The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution. 		
		The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.		
		D. Final Monitoring Report(s)		
		 The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved. 		
		 The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution. 		
Cultural Resources				
ould the project result in the alteration,	a. Historic Resources	CUL-1: Archaeological and Native American Monitoring		
cluding the adverse physical or	A site visit, record search, and photo survey was conducted	I. Prior to Permit Issuance	Significant	
esthetic effects and/or the destruction f a prehistoric or historic building	for the project site. None of the existing buildings located on-	A. Entitlements Plan Check		
ncluding an architecturally significant uilding), structure, or object or site?	site were determined to be of historical significance, and implementation of the project would result in a less than significant impact to historical resources.	 Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction 		
	b. Prehistoric/Archeological Resources	meeting, whichever is applicable, the Assistant Deputy Director (ADD)		
	The project site is located within an area identified as having	Environmental designee shall verify that the requirements for Archaeological		
	a high sensitivity level for archaeological resources. Several	Monitoring and Native American monitoring have been noted on the		
	previously recorded historic and prehistoric sites have been	applicable construction documents through the plan check process.		
	identified in the project vicinity, including a prehistoric Native American village located west of the project site. As such,	B. Letters of Qualification have been submitted to ADD		
cultura disturb resourd project disturb resourd impact	cultural resources could be buried beneath the level of disturbance, and there is a potential for buried cultural	monitoring program must have completed the 40 hour 17/2/VOT ER training		
	resources to be impacted through implementation of the project. Therefore, there is the potential for ground-disturbing activities to result in impacts to unknown historical resources (archaeology), resulting in a potentially significant			
	impact, which would be mitigated through implementation of mitigation measure CUL-1 .	 with certification documentation. 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG. 		
		3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.		

Environmental Issue Results of Impact Analysis II. Prior to Start of Construction A. Verification of Records Search A. Verification of Records Search The PI shall provide verification includes, but is not limited to a copy of a confirmation letter from South Coastal information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. The PI may submit a detailed letter to MMC requesting a reduction to the ¼-mile radius. B. PI Shall Attend Precon Meetings The Piror to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified archaeologist and Native American monitor shall attend any grading/excavation related precon meetings to make comments and/or suggestions concerning the archaeological monitoring program with the CM and/or Grading Contractor.
 A. Verification of Records Search 1. The PI shall provide verification to MMC that a site specific records search (¼-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. 3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼-mile radius. B. PI Shall Attend Precon Meetings 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified archaeologist and Native American monitor shall attend any grading/excavation related precon meetings to make comments and/or suggestions concerning the archaeological monitoring program with the CM
 a. If the PI is unable to attend the precon meeting, the applicant shall schedule a focused precon meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring. 2. Identify Areas to be Monitored a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. b. The AME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).

	Summary of Significan	Table S-1		
	Summary of Significant Environmental Analysis Results Impact L			
Environmental Issue	Results of Impact Analysis	Mitigation	After Mitigation	
		3. When Monitoring Will Occur		
		 a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur. 		
		 b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present. 		
		III. During Construction		
		A. Monitor(s) Shall be Present During Grading/Excavation/Trenching		
		 The archaeological monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The CM is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration (OSHA) safety requirements may necessitate modification of the AME. 		
		2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B–C and IV.A–D shall commence.		
		3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.		
		4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.		
		B. Discovery Notification Process		
		 In the event of a discovery, the archaeological monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of 		

	Summary of Significa	Table S-1 ant Environmental Analysis Results	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigatio
		discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.	
		2. The monitor shall immediately notify the PI (unless monitor is the PI) of the discovery.	
		3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.	
		 No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered. 	
		C. Determination of Significance	
		 The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If human remains are involved, follow protocol in Section IV below. 	
		 a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. 	
		b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.	
		c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the final monitoring report. The letter shall also indicate that that no further work is required.	
		IV. Discovery of Human Remains	
		If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.3(e), the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) shall be undertaken:	

	Table S-1 Summary of Significant Environmental Analysis Results			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		 A. Notification 1. Archaeological monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the monitor is not qualified as a PI. MMC will notify the appropriate senior planner in the Environmental Analysis Section of the Development Services Department to assist with the discovery notification process. 		
		The PI shall notify the medical examiner after consultation with the RE, either in person or via telephone.		
		B. Isolate discovery site		
		 Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the medical examiner in consultation with the PI concerning the provenance of the remains. 		
		The medical examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.		
		3. If a field examination is not warranted, the medical examiner will determine with input from the PI, if the remains are or are not most likely to be of Native American origin.		
		C. If human remains ARE determined to be Native American		
		 The medical examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the medical examiner can make this call. 		
		 NAHC will immediately identify the person or persons determined to be the most likely descendent (MLD) and provide contact information. 		
		 The MLD will contact the PI within 24 hours or sooner after the medical examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.3(e), the California Public Resources and Health & Safety Codes. 		
		 The MLD will have 48 hours <u>after inspection of the site</u> to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods. 		
		5. Disposition of Native American human remains will be determined between the MLD and the PI, and, if:		
		a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR		
		b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with Public Resources Code		

Table S-1 Summary of Significant Environmental Analysis Results			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Leve After Mitigation
	·	5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN,	
		c. In order to protect these sites, the landowner shall do one or more of the following:	
		(1) Record the site with the NAHC;	
		(2) Record an open space or conservation easement on the site;	
		(3) Record a document with the County.	
		d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures, the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.	
		D. If Human Remains are NOT Native American	
		The PI shall contact the medical examiner and notify them of the historic era context of the burial.	
		The medical examiner will determine the appropriate course of action with the PI and City staff (Public Resources Code 5097.98).	
		3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, Environmental Analysis Section, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.	
		V. Night and/or Weekend Work	
		A. If night and/or weekend work is included in the contract:	
		 When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 	
		2. The following procedures shall be followed.	
		a. No Discoveries	
		In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 a.m. of the next business day.	

	Summary of Signific	Table S-1 ant Environmental Analysis Results	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigatio
		b. Discoveries	
		All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.	
		c. Potentially Significant Discoveries	
		If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV – Discovery of Human Remains shall be followed.	
		d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.	
		B. If night and/or weekend work becomes necessary during the course of construction:	
		 The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 	
		2. The RE, or BI, as appropriate, shall notify MMC immediately.	
		C. All other procedures described above shall apply, as appropriate.	
		VI. Post Construction	
		A. Preparation and Submittal of Draft Monitoring Report	
		1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.	
		 For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report. 	
		 Recording Sites with State of California Department of Parks and Recreation. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms—DPR 523A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's HRG, 	

	Table S-1 Summary of Significant Environmental Analysis Results			
Environmental Issue	Results of Impact Analysis		Impact Level After Mitigation	
Environmental Issue	Results of Impact Analysis	and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report. 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to MMC for approval. 4. MMC shall provide written verification to the PI of the approved report. 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. 8. Handling of Artifacts 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged. 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. 3. The cost for curation is the responsibility of the property owner. C. Curation of artifacts: Accession Agreement and Acceptance Verification 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable. 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC. 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5. D. Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), withi	After Mitigation	

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		nvironmental Analysis Results	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project result in any impact to existing religious or sacred uses within the potential impact area?	No religious or sacred uses were identified on-site or within the immediate vicinity of the project site as a result of Native American consultation. Therefore, project implementation would have a less than significant impact related to religious and sacred uses.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?	No known burial sites or cemeteries exist within the vicinity of the project site and it is not expected that human remains would be disturbed as a result of the project. In the unlikely event of the discovery of human remains during project grading, work would halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) would be undertaken. Although it is not expected that human remains would be located on the project site, there is a potential for buried human remains to be disturbed by grading and construction activities. Therefore, impacts associated with human remains would be potentially significant, which would be mitigated through implementation of mitigation measure CUL-1 .	See mitigation measure CUL-1: Archaeological and Native American Monitoring.	Less Than Significant
Tribal Cultural Resources	<u> </u>		
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	The City received consultation requests from the lipay Nation of Santa Ysabel and the Jamul Indian Village of Kumeyaay Nation. During tribal consultation, neither tribe identified any known tribal cultural resources on the project site, but requested that Native American monitors be present during ground disturbance activities. In addition, no archaeological sites or known burial sites or cemeteries are located within the vicinity of the project area, and it is not expected that human remains would be disturbed as a result of the project. Although unlikely based on the prior site disturbance, grading activities may uncover and destroy subsurface cultural deposits, thereby resulting in a significant impact to tribal cultural resources, which would be mitigated through implementation of mitigation measure CUL-1 .	See mitigation measure CUL-1: Archaeological and Native American Monitoring.	Less Than Significant
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set			

		ble S-1		
Summary of Significant Environmental Analysis Results				
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?				
Traffic and Circulation				
Would the project result in traffic generation that would cause an intersection, roadway segment, freeway segment, interchange or ramp to operate at level of service (LOS) E or F under either direct or cumulative conditions and exceed the City of San Diego significance thresholds?	 a. Existing Plus Project Condition All project study area intersections would operate at LOS D or better under the Existing Plus Project condition. The following two street segments would operate at LOS F under Existing Plus Project conditions and would exceed the City's threshold for volume to capacity (V/C) increase, resulting in a significant direct street segment impact: Segment #2: Morena Boulevard, from Frankfort Street to Knoxville Street, Segment #3: Morena Boulevard, from Knoxville Street to Tecolote Road b. Near-Term Plus Project Condition (Opening Day Year 2021) All study area intersections would operate at LOS D or better under Near-Term Plus Project conditions. Therefore, impacts to intersections under the Near-Term Plus Project condition would be less than significant. Street Segments #2 and #3 (identified above) would operate at LOS F under Near-Term Plus Project conditions and would exceed the City's threshold for allowable V/C increase, resulting in a significant direct impact. c. Year 2035 Plus Project Condition The project would result in less than significant impacts to intersections under the Year 2035 Plus Project condition. Segment #2 would operate at LOS E and would exceed the 	TRA-1: Installation of Adaptive Signal Control Systems Prior to issuance of any building permit, the Owner/Permittee shall assure, by permit and bond, the installation of an adaptive signal control system at three intersections on Morena Boulevard, to the satisfaction of the City Engineer. The three intersections would include West Morena Boulevard, Knoxville Street, and Tecolote Road. Improvements shall include enhanced fiber-optic signal interconnects and communications, additional detection sensors and computer equipment at each intersection, and a remote link to the Traffic Management Center downtown, satisfactory to the City Engineer. A proposed implementation plan for installation of the adaptive signal control system shall be provided to the City of San Diego by the applicant as early as possible. All improvements shall be completed and accepted by the City Engineer prior to first occupancy.	Less than significant	

	Table S-1				
	Summary of Significant Environmental Analysis Results				
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation		
	Existing Plus Project, Near-Term, and Year 2035 Plus Project impacts identified above would be mitigated through implementation of mitigation measure TRA-1 .				
Would the project result in increased demand for off-site parking or affect existing parking?	The project would incorporate a total of 267 vehicular parking spaces, including 99 attached garages, 52 detached carports with 1 accessible parking space, 1 detached maintenance garage, and 115 open parking spaces with 2 accessible parking spaces. In addition, 70 bicycle parking spaces and 16 motorcycle parking spaces are proposed. Proposed parking would exceed City minimum parking requirements for the proposed use. The project would not increase demand for off-site parking or result in any adverse effects on existing parking. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant		
Would the project result in a substantial impact upon existing or planned transportation systems? Would the project result in a conflict with adopted policies, plans or programs supporting alternative transportation models (e.g., bus turnouts, bicycle racks)? Would the project result in substantial alterations to present circulation movements that restrict access to public or private land?	Implementation of the project would not result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, or propose roadways that would not properly align with other existing or planned transportation systems. The project would not conflict with adopted policies, plans, or programs supporting alternative transportation models. Impacts to existing or planned transportation systems or adopted policies, plans, or programs supporting alternative transportation would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant		
Would the project increase traffic hazards for motor vehicles, bicyclists, or pedestrians due to a proposed nonstandard design features (e.g., poor sight distance or driveway onto an access-restricted roadway)?	Implementation of the project would not result in increased traffic hazards to motor vehicles, bicyclists or pedestrians due to proposed non-standard design features. The project would result in a less than significant impact related to traffic hazards and emergency access.	Impacts would be less than significant. No mitigation is required.	Less than Significant		
Aesthetics			1		
Would the project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?	The project would not block a view through a designated public view corridor as identified in the CMCP or block any public viewing area. The project would not exceed height and bulk regulations resulting in view blockage. Additionally, the project would not open up a new area for development, and therefore would not result in cumulative view blockages. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant		

	Table S-1				
	Summary of Significant Er	nvironmental Analysis Results			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation		
Would the project result in the creation of a negative aesthetic site or project?	The project would not result in significant impacts related to development features. The project would not create a disorganized appearance or conflict with the height, bulk, and coverage regulations. Retaining walls would be screened from public view, and the project would not create an exceedingly monotonous visual environment. Therefore, impacts related to the project's development features would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant		
Would the project result in bulk, scale, materials, or style which would be incompatible with surrounding development? Would the project cause a substantial alteration to the existing or planned character of the area? Would the project result in the loss of a distinctive landmark as identified in the community plan?	The project would not result in significant impacts related to neighborhood character/architecture. The project would be consistent with and would contribute to the character of the project area by constructing a multi-family development that meets current design requirements and landscape standards. Therefore, neighborhood character impacts would be less than significant. Additionally, the project would not open up a new area for development or change the overall character of the area, and therefore would not result in cumulative effects to the neighborhood character.	Impacts would be less than significant. No mitigation is required.	Less than Significant		
Would the project result in a substantial change in the existing landform?	While the project would require 10,500 cubic yards of cut at a maximum depth of 9 feet and 11,800 cubic yards of fill at a maximum depth of 7 feet, the project would not result in significant impacts related to landform alteration/grading based on the City's threshold conditions for a significant impact. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant		
Would the project cause a substantial light or glare which would adversely affect daytime or nighttime views in the area?	Temporary construction lighting would be limited to daylight hours, and would not contribute to substantial light or glare. During operation, parking areas, pedestrian walkways, landscaping, and architectural features would be illuminated and accented with lighting for enhanced security and safety. As with the existing condition, the site will be screened by intervening walls and landscaping that shields light to and from the public roadway and the residents living within the complex. The project would not emit or reflect a significant amount of light or glare and would not result in significant lighting and glare impacts.	Impacts would be less than significant. No mitigation is required.	Less than Significant		

Table S-1 Summary of Significant Environmental Analysis Results			
Environmental Issue Health and Safety/Hazardous Materials	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	The project would not result in wildland fire impacts because the project is not adjacent to wildlands and would be designed to be consistent with all relevant fire code regulations, including adequate fire hydrant services and street access. Therefore, impacts associated with risk of wildland fires would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?	The project is not located within a quarter-mile of a school. Therefore, impacts associated with hazards located within a quarter-mile of a school would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	The project would not impair implementation of, or physically interfere with, the San Diego Emergency Plan. Additionally, the project would be subject to review by the San Diego Fire Department and the San Diego Police Department to ensure compliance with applicable safety standards. As such, the project would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans. Therefore, impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?	The project site is not located on or near known contamination sources. All applicable federal, state, county, and/or local standards would apply if certain hazards such as asbestos-containing materials (ACMs) or a well were discovered on-site. Therefore, impacts associated with hazardous material sites would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the project result in a safety hazard for people residing or working in a designated airport influence area?	The project site is located within the Airport Influence Area Review Area 2, but not within a safety zone as depicted in the SDIA ALUCP. The proposed height would be approximately 66 feet above mean sea level and would not exceed the Federal Aviation Authority Part 77 height requirement triggering a need for Federal Aviation Administration notification. Therefore, safety hazard impacts associated with the project site's proximity to the SDIA would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant

Table S-1 Summary of Significant Environmental Analysis Results			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Hydrology			
Would the proposal result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?	Post-construction peak flows would decrease by approximately 3 cubic feet per second (cfs) compared to existing peak flow rates. The on-site storm drain system would be designed to adequately convey anticipated runoff to the public system which is able to support project flows. Therefore, impacts associated with alterations to drainage patterns would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the project develop wholly or partially within the 100-year floodplain identified in the Federal Emergency Management Agency (FEMA) maps or impose flood hazards on other properties?	The southern portion of the project site is located within FEMA Zone AO (100-year floodplain). Construction of the project would include a net import of approximately 1,000 cubic yards in order to increase elevations and raise all portions of the project site on which housing would be constructed out of the 100-year floodplain. As such, the proposed buildings would be constructed above flood elevations per City and FEMA requirements. Therefore, impacts associated with flood hazards would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the proposal result in a substantial increase in impervious surfaces and associated increased runoff?	Implementation of the project would not increase impervious surfaces resulting in increased runoff, as the project would decrease impervious areas by approximately 16 percent (1 acre) compared to the existing condition. The project would result in a reduction in storm water flow rates, decreasing from 48.5 cfs to 45.3 cfs (approximately 3 cfs). Runoff volumes would be reduced with the implementation of project best management practices (BMPs). Impacts related to runoff would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Water Quality			
Would the project result in an increase in pollutant discharge to receiving waters during or following construction or discharge identified pollutants to an already impaired water body?	The project would implement source control, site design, and structural or treatment BMPs to ensure protection of water quality. The project would incorporate these features to reduce storm water discharge off-site. The project would comply with all applicable federal, state, and local water quality standards through adherence to the City's new Storm Water Standards. Implementation of the proposed BMPs would reduce pollutant discharge to receiving waters during and following construction. Therefore, impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant

		ble S-1	
Environmental Issue Geology and Soils	Results of Impact Analysis	Nitigation	Impact Level After Mitigation
Would the project expose people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?	The project would not expose people or structures to impacts associated with earthquakes, liquefaction, landslides, or tsunamis/seiches. Adherence to the recommendations presented in the Preliminary Geotechnical Investigation prepared for the project and compliance with applicable CBC regulations would ensure that impacts related to geologic hazards would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the project result in a substantial increase in wind or water erosion of soils, either on or off the site?	The project would not result in substantial soil erosion or the loss of topsoil, as adherence to the City's Grading Ordinance and Construction Building Code, as well as the implementation of the recommendations presented in the Preliminary Geotechnical Investigation would ensure that impacts associated with erosion would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the proposal, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? Would the project 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?	The project would not result in geological hazard due to unstable soil, as the Preliminary Geotechnical Investigation did not identify unstable geologic units on or adjacent to the project site. The project site was identified to have a medium expansive soil potential, which would not result in a potential risk to life or property. Adherence to the recommendations presented in the Preliminary Geotechnical Investigation prepared for the project would ensure that impacts related to unstable geological units or soils would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant
Public Services			
Would the project have an effect upon, or result in a need for new or altered government services in any of the following areas: fire/life safety protection; police protection; schools, parks or other recreational facilities; maintenance of public facilities, including roads and libraries, which would result in physical impacts?	a. Fire Protection/Life Safety The project would increase the density on the project site; however, the change in land use and intensity of residential development is not anticipated to result in a substantial increase in calls for service, and would not result in a need for new fire protection facilities. The project would pay applicable Development Impact Fees (DIFs) prior to issuance of building permits to maintain fire protection services provided by the City. The project does not require or necessitate the construction of any fire facilities that could have an adverse physical impact on the environment. Therefore, impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant

	Table S-1 Summary of Significant Environmental Analysis Results			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
Environmental Issue	b. Police Protection The project would increase the density on the project site; however, the change in land use and intensity of residential development is not anticipated to result in a substantial increase in calls for police response, and would not result in a need for new police facilities. The project would pay applicable DIFs prior to issuance of building permits to maintain police protection services provided by the City. The project does not require or necessitate the construction of any police protection facilities that could have an adverse physical impact on the environment. Therefore, impacts would be less than significant. c. Parks/Recreational Facilities No new population-based park facilities would be required. As the project does not include or require the construction of any new public parks, there would be no associated physical impact associated with parkland construction. The applicant would be required to pay DIFs prior to issuance of building permits to ensure funds are available to the City for the construction of future park facilities. Impacts related to parks and recreation facilities would be less than significant.	Mitigation	After Mitigation	
	d. Libraries While future residents may use the public library system, the project is not anticipated to result in the need for any new libraries or modified library services and would not contribute to an unacceptable level of service. The project does not require any new or modified library services to maintain acceptable levels of service. Thus, physical impacts related to new library facilities would be less than significant. e. School Facilities The project would generate new students that would increase enrollment at the San Diego Unified School District schools			
	serving the community in which the project is located. However, Government Code Section 65995 and Education Code Section 53080 authorize school districts to impose facility mitigation fees on new development to address any increased enrollment that may result. Adherence to the requirements of SB 50 through payment of a school impact fee prior to issuance of a building permit would ensure that project impacts to schools would be less than significant.			

	Table S-1				
Summary of Significant Environmental Analysis Results					
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Leve After Mitigati		
	f. Other Public Facilities including Roads	<u> </u>			
	The project would install half-width frontage improvements				
	along Tonopah Avenue, Frankfort Street, and Morena				
	Boulevard. No significant physical impacts associated with				
	these road improvements have been identified. No other				
	public facility needs or deficiencies have been identified as a				
	result of the project. Impacts associated with construction of				
	other public facilities would be less than significant.				
ltilities					
Vould the project result in the need for	a. Water Supply	Impacts would be less than significant. No mitigation is required.	Less than		
new systems, or require substantial laterations to existing utilities, the	Based on the anticipated water demand assessments		Significant		
construction of which would create	included in the 2015 City of San Diego and San Diego County				
physical impacts (water, sewer, solid	Water Authority Urban Water Management Plan, current and future water supplies would be adequate to serve the				
vaste disposal, natural gas, and	projected needs of the project, as well as regional water				
ommunication systems)?	needs. As a result, no new or expanded sources of water				
	supply would need to be developed that could result in				
	physical impacts to the environment. As the existing and				
	planned water supply is adequate to serve the water				
	demands of the project, impacts would be less than				
	significant.				
	b. Water System				
	Water distribution pipelines would be installed within on-site				
	project streets and would connect to existing mains within				
	the adjacent streets. No water system extensions would be				
	required to serve the project. Proposed water infrastructure				
	would meet City Water Department Facility Design Guidelines, and impacts would be less than significant.				
	c. Wastewater System				
	Wastewater infrastructure would be installed within project				
	site consisting of a series of private 6-inch collector laterals,				
	connecting to the 6-inch public sewer main in Frankfort				
	Street. No new public facilities would be required. The				
	proposed on-site private sewer mains would meet design				
	and flow requirements in accordance with the City Sewer				
	Design Guide. In addition, the project would not cause any				
	significant impacts to the existing off-site public 6-inch sewer				
	main in Frankfort Street. Impacts would be less than				
	significant.				

Table S-1				
Summary of Significant Environmental Analysis Results				
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
	d. Solid Waste			
	The project's demolition, grading, and construction phases would achieve a total waste diversion rate of 96 percent. The applicant or applicant's successor in interest would be required to implement the project-specific Waste Management Plan (WMP) during project operation to comply with the City's Recycling Ordinance and ensure solid waste impacts are reduced to less than significant. With implementation of the WMP and compliance with existing regulations, impacts related to solid waste would be less than significant.			
	e. Natural Gas			
	There are existing natural gas facilities present in the surrounding roadways and available to serve the project. Impacts would be less than significant.			
	f. Communication Systems			
	A number of private utility providers are available to serve the CMCP area. Facilities are existing in surrounding roadways and are available to serve the project. Impacts would be less than significant.			
Would the project result in the use of excessive amounts of water? Would the project propose landscaping which is predominantly non-drought resistant vegetation?	The project does not propose predominantly non-drought resistant vegetation landscaping, and would not result in the need to use excessive amounts of water. The project's water use would not be considered excessive considering required compliance with current building code standards, the City's Climate Action Plan (CAP) Consistency Checklist requirements, and the City's landscape regulations. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant	
Air Quality				
Would the project conflict with or obstruct the implementation of the applicable air quality plan?	The project would not result in impacts to air quality plan implementation, as the project would generate fewer trips than what is currently accounted for in the growth forecast in the General Plan and would be consistent with the growth assumptions of the San Diego Air Pollution Control District's Regional Air Quality Strategy (RAQS). Therefore, the project would not conflict with or obstruct implementation of the RAQS, and impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant	

	Table S-1 Summary of Significant Environmental Analysis Results				
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation		
Would the project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation? Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment?	a. Construction Emissions Maximum daily construction emissions are projected to be less than the applicable thresholds for all criterion pollutants. Therefore, project construction would not result in regional emissions that would exceed the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) or contribute to existing violations, and construction emission impacts would be less than significant. b. Operation Emissions Future emissions due to operation of the project are projected to be less than the applicable significance thresholds for all pollutants. Therefore, as project operation emissions would be below these limits, project operation would not result in regional emissions that would exceed the NAAQS or CAAQS or contribute to existing violations, and operational impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant		
	c. Non-Attainment The region is classified as attainment for all criterion pollutants except ozone, particulate matter 10 (PM ₁₀), and particulate matter 2.5 (PM _{2.5}). The San Diego Air Basin (SDAB) is non-attainment for the 8-hour federal and state ozone standards. Emissions of ozone precursors (reactive organic gases and oxides of nitrogen), PM ₁₀ , and PM _{2.5} from construction and operation would be below the applicable thresholds. Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM ₁₀ , or PM _{2.5} , and impacts would be less than significant.				
Would the project expose sensitive receptors to substantial pollutant concentration including air toxics such as diesel particulates?	a. Construction Diesel Particulate Matter Due to the limited duration of construction activity, diesel particulate matter (DPM) generated by project construction is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer for the maximally exposed individual or to generate ground-level concentrations of non-carcinogenic toxic air contaminants that exceed a hazard index greater than 1 for the maximally exposed individual. Additionally, with ongoing implementation of U.S. Environmental Protection Agency and California Air Resources Board requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types, the DPM emissions of individual	Impacts would be less than significant. No mitigation is required.	Less than Significant		

Table S-1			
Environmental Issue	Summary of Significant Environmental Anal Results of Impact Analysis	Mitigation	Impact Leve After Mitigation
	equipment continues to reduce over time. Therefore, project construction would not expose sensitive receptors to substantial pollutant concentration.	<u> </u>	
	b. Carbon Monoxide Hot Spots		
	Localized carbon monoxide (CO) concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. The SDAB is a CO maintenance area under the federal Clean Air Act. This means that SDAB was previously a nonattainment area and is currently implementing a 10-year plan for continuing to meet and maintain air quality standards. As a result, ambient CO levels have declined significantly. CO hot spots have been found to occur only at signalized intersections that operate at or below LOS E with peak hour trips for that intersection exceeding 3,000 trips. Based on the traffic impact analysis (see Appendix D), the project would not result in a signalized intersection to operate at a LOS E or worse and would not contribute to a significant impact at existing LOS E or worse intersections. Therefore, the project would not be anticipated to result in a CO hot spot and localized air quality impacts to sensitive receptors would be less than significant.		
	c. Freeway Diesel Particulate Matter		
	The project site is located adjacent to Interstate 5 (I-5) and portions of the project site are located within 500 feet of I-5. However, the risk to residences would be reduced by the inclusion of various project design features, including planting vegetation between the freeway and project site, construction of a wall around the pool area and along the frontage of the project site, and the provision of heating, ventilation, and air conditioning units with MERV-13, or better, air filters in each unit. The MERV-13 filters would remove particulates entering the indoor air, thus reducing cancer risk from diesel exhaust exposure. Therefore, with the inclusion of these design elements, the potential increase in cancer risk and the non-cancer chronic risks would be less		

	Table S-1 Summary of Significant Environmental Analysis Results			
Environmental Issue	Results of Impact Analysis	Mitigation	lmpact Level After Mitigation	
Would the project create objectionable odors affecting a substantial number of people?	The project does not include heavy industrial or agricultural uses that are typically associated with odor complaints. During construction, diesel equipment may generate some nuisance odors. However, exposure to odors associated with project construction would be short term and temporary in nature. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant	
Would the project exceed 100 pounds per day of particulate matter (dust)?	Construction and operation of the project would not result in Particulate Matter 10 emissions exceeding 100 pounds per day. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant	
Greenhouse Gas Emissions			1	
Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	The project would be consistent with the CAP as detailed in the CAP Consistency Checklist. The project would incorporate project features to minimize greenhouse gas (GHG) emissions, and specific project requirements detailed in the CAP Consistency Checklist would become project conditions of approval. The project would be consistent with the goals and strategies of the CAP and enforceable conditions of the CAP Consistency Checklist that ensures project GHG emissions would be less than significant.	Impacts would be less than significant. No mitigation is required.	Less than Significant	
Would the project conflict with the City's CAP or an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs?	 a. Consistency with State Plans The City has adopted a qualified GHG emissions reduction plan that outlines an approach to reach the state Scoping Plan GHG reduction targets. Project construction and operation would be required to include all mandatory green building measures under the CALGreen Code and all requirements of the CAP Consistency Checklist. Therefore, the project would be consistent with the Scoping Plan measures through incorporation of stricter building and appliance standards and measures identified in the CAP Consistency Checklist that identify project consistency with the City's CAP. b. Consistency with Local Plans The project would implement the City General Plan City of Villages strategy by intensifying residential uses at the project site and locating high-density residential uses in proximity to high-quality transit. The project would be consistent with the CAP, as determined by completion of the CAP Consistency 	Impacts would be less than significant. No mitigation is required.	Less than Significant	



Chapter 1.0 Introduction

This Environmental Impact Report (EIR) addresses the potential environmental effects of the proposed Morena Apartment Homes project (project) and has been prepared by the City of San Diego (City) in compliance with the California Environmental Quality Act (CEQA) and Guidelines (Public Resources Code, Section 21000 et seq. and California Code of Regulations, Title 14, Section 15000, et seq.), and in accordance with the City of San Diego's EIR Guidelines (City of San Diego 2005) and Significance Determination Thresholds (City of San Diego 2016a).

The project would remove the Recreational Vehicle (RV) park and the existing residences on-site and construct 150 market-rate multi-family residential units. The project would also include an approximately 4,400-square-foot clubhouse facility with leasing and exercise areas, recreational areas including a pool and an approximately 319-square-foot pool house building, landscaping, and water quality best management practices. The 6.21-acre project site (5.73 acres plus 0.48 acre of right-of-way dedication) is located at 1577-79 Morena Boulevard in the City of San Diego, immediately east of Interstate 5 (I-5) and Morena Boulevard, west of Frankfort Street, and south of Tonopah Avenue.

Discretionary actions required to implement the project include:

- General Plan Amendment
- Community Plan Amendment
- Rezone
- Land Development Code and Local Coastal Program Amendment
- Planned Development Permit
- Site Development Permit
- Vesting Tentative Map

1.1 EIR Purpose and Intended Uses

The EIR is informational in nature and is intended for use by City decision makers, other agencies, and the public in evaluating the potential environmental effects, mitigation measures, and alternatives of the project.

By recognizing the environmental impacts of the project, decision makers will have a better understanding of the physical and environmental changes that would accompany the approval of the project. The EIR includes recommended mitigation measures which, when implemented, would lessen or avoid significant effects of the project on the environment, whenever feasible. Alternatives to the project are presented that could further reduce or avoid significant impacts associated with the project.

1.2 EIR Legal Authority

1.2.1 Lead Agency

The City is the Lead Agency for the project pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The Lead Agency, as defined by CEQA Guidelines Section 15367, is the public agency that has the principal responsibility and authority for carrying out or approving the project. As Lead Agency, the City Development Services Department, Environmental Analysis Section (EAS) conducted a preliminary review of the project and determined that this EIR was required. The analysis and findings in this document reflect the independent, impartial conclusions of the City.

1.2.2 Responsible and Trustee Agencies

State law requires that all EIRs be reviewed by Responsible and Trustee Agencies. A Responsible Agency, defined pursuant to State CEQA Guidelines Section 15381, includes all public agencies other than the Lead Agency which have discretionary approval power over the project. A Trustee Agency is defined in Section 15386 of the CEQA Guidelines as a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the state of California.

Implementation of the project would require consultation with the following Trustee Agencies, as described below.

Federal Emergency Management Agency (FEMA): FEMA administers the National Flood Insurance Program, which is based on the minimal requirements for floodplain management and is designed to minimize flood damage within Special Flood Hazard Areas. Pursuant to the Federal Insurance Rate Map, the southwestern portion of the project site lies within a Special Flood Zone Area, or FEMA flood area, Zone AO. The project requires FEMA review and approval of a Conditional Letter of Map Revision based on fill prior to discretionary project approval and a final Letter of Map Revision based on fill after grading and construction is complete to demonstrate that the project site is raised outside of a 100-year flood zone.

1.3 EIR Scope and Content and Format

1.3.1 Scope

The scope of analysis for this EIR was determined by the City as a result of initial project review and consideration of comments received in response to a Notice of Preparation (NOP) circulated between June 16 and July 17, 2017 for the project. The City's NOP, associated responses, and comments made during the review period are included in Appendix A of this EIR. Comment letters received during the NOP scoping process included comments by a number of local and state agencies, Native American Tribes, and concerned citizens. Issues that were raised included land use conflicts between the proposed project and the land use documents governing the project site, affordable housing concerns, traffic and transportation concerns, and comments requesting cultural/historical resource monitoring and consultation under Assembly Bill 52 and Senate Bill 18. The comments received during the NOP scoping period were reviewed and considered during the drafting of this EIR.

Through these scoping activities, the project was determined to have the potential to result in the following significant environmental impacts:

- Land Use
- Noise
- Paleontological Resources
- Cultural Resources
- Tribal Cultural Resources
- Traffic Circulation
- Visual Effects and Neighborhood Character

- Health and Safety/Hazardous Materials
- Hydrology
- Water Quality
- Geology and Soils
- Public Services
- Utilities
- Air Quality
- · Greenhouse Gas Emissions

1.3.2 Type of EIR

This EIR has been prepared as a Project EIR, as defined in Section 15161 of the CEQA Guidelines. In accordance with CEQA, this Project EIR examines the environmental impacts of a specific development project, and focuses on the physical changes in the environment that could result from the project.

1.3.3 EIR Content

The intent of this EIR is to determine whether implementation of the project would have a significant effect on the environment through analysis of the issues identified during the scoping process (see Section 1.3.1 above). Pursuant to CEQA Guidelines Section 15126, all phases of the project are considered in this EIR when evaluating its potential impacts on the environment, including the planning, acquisition, development, and operation phases. Impacts are identified as direct or

indirect, short-term or long-term, and assessed on a "plan-to-ground" basis. The "plan-to-ground" analysis addresses the changes or impacts that would result from implementation of the project compared to existing conditions.

1.3.4 EIR Format

1.3.4.1 Organization

The format and order of contents of this EIR follow the direction of the City's EIR Guidelines (2005). A brief overview of the various chapters of this EIR is provided below:

- **Executive Summary.** Provides a summary of the EIR, a brief description of the project, identification of areas of controversy, and inclusion of a summary table identifying significant impacts, proposed mitigation measures, and impact rating after mitigation. A summary of the analyzed project alternatives and a comparison of the potential impacts of the alternatives with those of the project are also provided.
- **Chapter 1.0, Introduction.** Contains an overview of the purpose and intended uses of the EIR; Lead, Responsible, and Trustee Agencies; and the CEQA environmental review process. It also provides a discussion of the scope and format of the EIR.
- Chapter 2.0, Environmental Setting. Provides a description of the project's regional context, location, and existing physical characteristics and land use. Available public infrastructure and services, as well as relationship to relevant plans, are also provided in this section.
- Chapter 3.0, Project Description. Provides a detailed discussion of the project, including background, objectives, key project features, and environmental design considerations. The discretionary actions required to implement the project are included.
- Chapter 4.0, Environmental Analysis. Provides a detailed evaluation of potential environmental impacts for several environmental issues. In accordance with the City's EIR Guidelines, Chapter 4.0 begins with the issue of land use, followed by the remaining issues in order of significance. Under each issue area in Chapter 4.0, Environmental Analysis, this EIR includes a description of the existing conditions and regulatory framework relevant to each environmental topic; presentation of threshold(s) of significance based on the City Development Services Department's CEQA Significance Determination Thresholds for the particular issue area under evaluation; identification of an issue statement; an assessment of any impacts associated with implementation of the project; a summary of the significance of any project impacts; and recommendations for mitigation measures and mitigation monitoring and reporting, as appropriate, for each significant issue area.
- Chapter 5.0, Significant Unavoidable Environmental Effects/ Irreversible Changes. Discusses the significant unavoidable environmental effects of the project, including those that can be mitigated but not reduced to below a level of significance. This chapter also describes the potentially significant irreversible changes that may be expected with development of the

project and addresses the use of nonrenewable resources during its construction and operational life.

- Chapter 6.0, Growth Inducement. Evaluates the potential influence the project may have on
 economic or population growth within the project area as well as the region, either directly or
 indirectly.
- **Chapter 7.0, Cumulative Impacts.** Identifies the impact of the project in combination with other planned and future development in the region.
- Chapter 8.0, Effects Found Not to Be Significant. Identifies all of the issues determined in the scoping and preliminary environmental review process to be not significant and briefly summarizes the basis for these determinations.
- **Chapter 9.0, Alternatives.** Provides a description of alternatives to the project, including Alternatives Considered but Rejected, a No Project (No Development) Alternative, a Current Plan Alternative, and a Relocated Community Open Space Alternative.
- **Chapter 10.0, Mitigation Monitoring and Reporting Program.** Documents all the mitigation measures identified in the EIR and required as part of the project.
- Chapter 11.0, References Cited. Lists all of the reference materials cited in the EIR.
- Chapter 12.0, Individuals and Agencies Consulted. Identifies all of the individuals and agencies contacted during preparation of the EIR.
- Chapter 13.0, Certification. Identifies the individuals responsible for the preparation of the EIR.

1.3.4.2 Technical Appendices

Technical appendices, used as a basis for much of the environmental analysis in the EIR, have been summarized in the EIR and are printed under separate cover as part of the EIR. The technical appendices are available for review at the City Development Services Center, 1222 First Avenue, MS 501, San Diego, California 92101.

1.3.4.3 Incorporation by Reference

As permitted by CEQA Guidelines Section 15150, this EIR has referenced several technical studies and reports, including the City General Plan EIR. Information from these documents has been briefly summarized in this EIR, and their relationship to this EIR described. These documents are included in Chapter 11.0, References Cited, are hereby incorporated by reference, and are available for review at the City Development Services Center, 1222 First Avenue, San Diego, California 92101.

1.4 EIR Process

The EIR review process occurs in two basic stages. The first stage is the Draft EIR, which offers the public the opportunity to review and comment on the document. The second stage is the Final EIR, which provides the basis for approving the project.

1.4.1 Draft EIR

In accordance with Sections 15085 and 15087 (a) (1) of the CEQA Guidelines, upon completion of the Draft EIR a Notice of Completion is filed with the State Office of Planning and Research, and notice of availability of the Draft EIR issued in a newspaper of general circulation in the area.

The Draft EIR is distributed for review to the public and interested and affected agencies for the purpose of providing comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated" (Section 15204, CEQA Guidelines).

This Draft EIR and all related technical studies are available for review during the public review period at the offices of the City, Development Services Department, Land Development Review, located at 1222 First Avenue, Fifth Floor, San Diego, California, 92101. Copies of the Draft EIR are also available at the following public libraries:

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

Clairemont Library 2920 Burgener Boulevard, San Diego, California 92110

The EIR is also available for review online at: http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml.

1.4.2 Final EIR

Following public review of the Draft EIR, the City will provide written responses to comments per CEQA Guidelines Section 15088 and will consider all comments in making its decision to certify the Final EIR. Responses to the comments received during public review and Findings of Fact will be prepared and compiled as part of the Final EIR.

The culmination of this process is a public hearing where the City Council will determine whether to certify the Final EIR as being complete and in accordance with CEQA. The Final EIR will be available at least 14 days prior to the first scheduled hearing.

2

Chapter 2.0 Environmental Setting

2.1 Regional Setting

The project site is located in the City of San Diego (City), within San Diego County (Figure 2-1). The project site is located just east of Mission Bay Park and Interstate 5 (I-5) and approximately 5 miles north of Downtown San Diego. The project site is located in the Pueblo Lands of San Diego Land Grant as identified on the U.S. Geological Survey 7.5-minute topographic map, La Jolla quadrangle (Figure 2-2). The project site is located in the southwestern portion of the Clairemont Mesa Community Plan (CMCP) area.

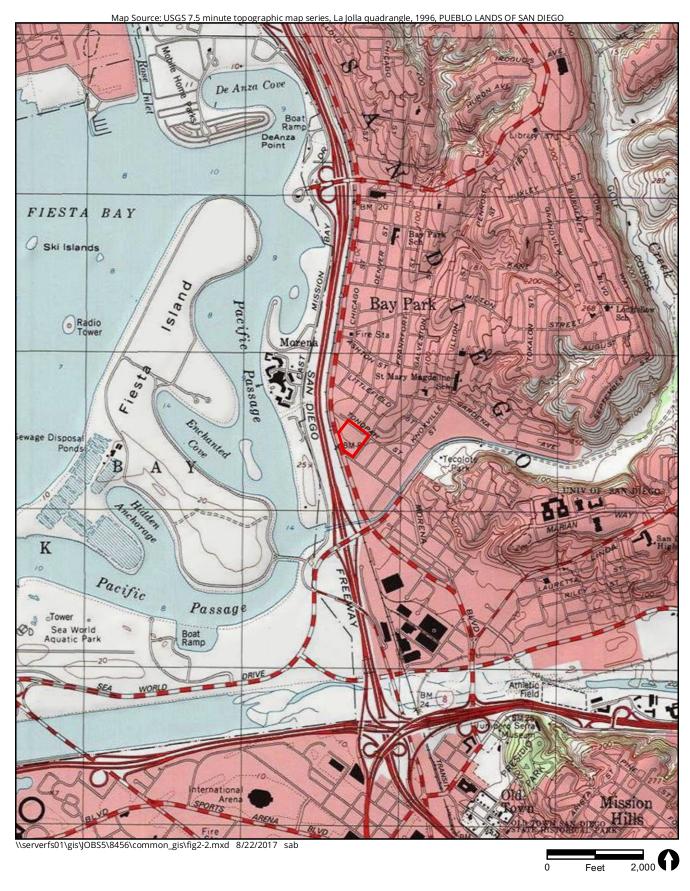
2.2 Project Location

As shown in the aerial photograph (Figure 2-3), the approximately 6.21-acre project site is located at the northeast corner of the West Morena Boulevard/Morena Boulevard intersection, east of I-5 and north of Tecolote Road in the CMCP area. The project site includes assessor's parcel numbers 436-020-40 and 436-020-41. The project site is associated with the following addresses: 1597, 1597½, 1623, 1639, 1641, 1643, and 1645 Morena Boulevard.



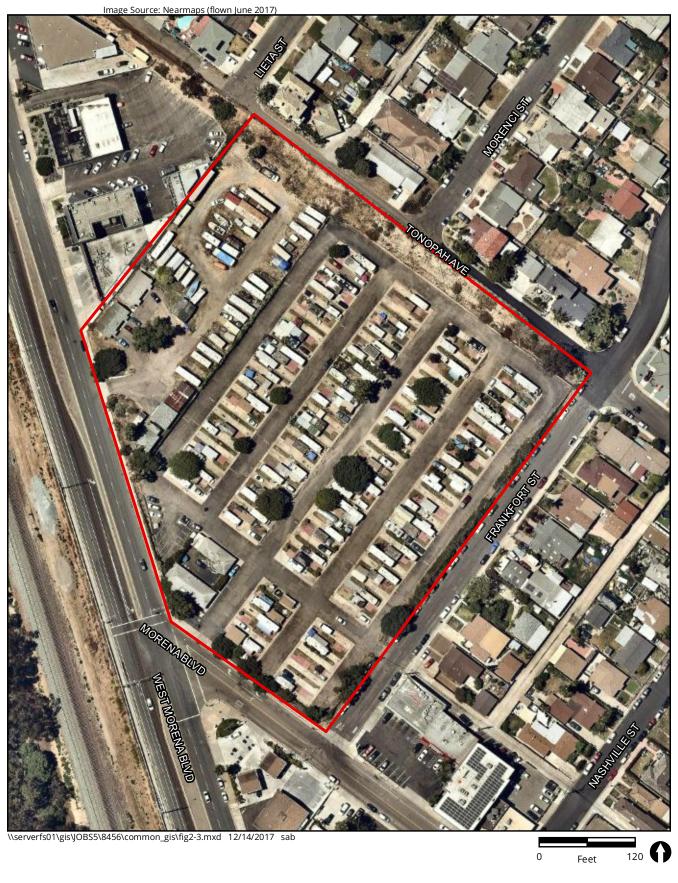


FIGURE 2-1 Regional Location



Project Boundary

FIGURE 2-2 Project Location on USGS Map



Project Boundary

FIGURE 2-3 Project Location on Aerial Photograph

2.3 Physical Environment

2.3.1 Land Use

The project site includes two parcels, a northern and southern project parcel. The southern project parcel is occupied by the 90-unit Coastal Trailer Villa recreational vehicle (RV) park. Each RV space has a parking area, a grassy strip, and electric hook-ups. The RV area is interspersed with some trees and approximately 33 small buildings that are restrooms/showers for occupant use. The RV park is accessed from two driveways, one from Morena Boulevard and one from Frankfort Street. An office, a structure for resident laundry, and a single family residence are located on the southern parcel near the Morena Boulevard driveway entrance.

There is an existing chain-link fence separating the northern parcel from the southern parcel. The northern parcel is accessible from the northern driveway access from Morena Boulevard. The northern parcel is completely disturbed including partial paving, dirt, and some gravel areas and a few interspersed trees. Two duplexes, one single-family residence, and an old wood barn are located on the northern parcel. The rear portion of the parcel is partially fenced and appears to be used for storage of trucks and RVs. Refer to Figure 2-4 for photographs of these existing land uses. The existing project frontage along Morena Boulevard and Frankfort Street are shown in Figure 2-5.

The project site sits at a lower elevation than residential land uses to the east due to an existing steep slope on the project site that separates the site from the higher elevation Tonopah Avenue and residential uses to the east. The existing slope below Tonopah is shown in Figure 2-6. Land uses immediately surrounding the project site include single-family residential land uses to the east and south, a convenience store directly across Frankfort Street to the south, and a gas station just south of the project site at the West Morena Boulevard and Morena Boulevard intersection. Immediately north of the project site, along Morena Boulevard, is a mixture of commercial uses including an automotive repair shop and a bar/music venue. Surrounding land uses are shown in Figure 2-7. The project site is located within the southwestern portion of the CMCP area. The community is characterized primarily by single-family residential homes that were built in the 1950s and 1960s. In the larger community of Clairemont Mesa, there are a number of commercial shopping centers, open space areas, parks, and schools. Industrial lands within the community are located along on Morena Boulevard and Santa Fe Street, north of Balboa Avenue.

2.3.2 Transportation and Access

The regional transportation network in the project area consists of I-5 to the west and I-8 to the south. Access from I-5 to the project site is provided by Tecolote Road, which is an east-west regional roadway located approximately 0.25 mile to the south. Tecolote Road intersects with West Morena Boulevard, which is a north-south regional roadway that is located adjacent to the western boundary of the project site. Morena Boulevard splits from West Morena Boulevard along the southwestern boundary of the project site and also serves as a north-south regional roadway. Frankfort Street is located adjacent to the southeastern project boundary and Tonopah Avenue is located adjacent to the northeastern project boundary.

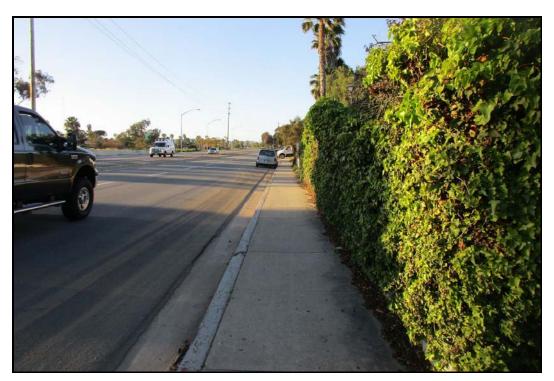


PHOTOGRAPH 1a Coastal Villa RV Park at left and RV/Truck Storage Area at Right



PHOTOGRAPH 1b RV/Truck Storage Area in Foreground, Duplexes/Residence and Old Barn in Background

FIGURE 2-4 Existing Land Uses



PHOTOGRAPH 1a Morena Boulevard Looking North from Existing Southern Driveway



PHOTOGRAPH 1b Frankfort Street Looking Southwest from Tonopah Avenue

FIGURE 2-5 **Existing Project Frontage**



PHOTOGRAPH 1a Slope Looking Northwest

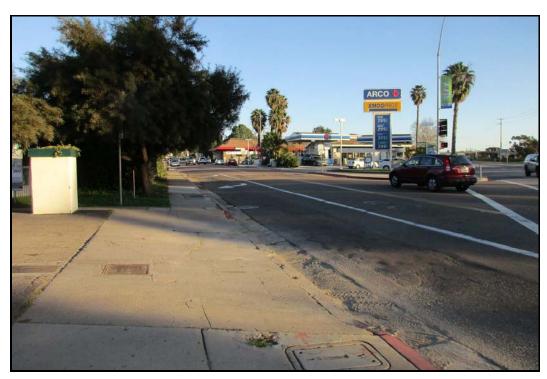


PHOTOGRAPH 1b Slope Looking Southeast

FIGURE 2-6 Slope Below Tonopah Avenue



PHOTOGRAPH 1a Corner of Frankfort Street and Morena Boulevard



PHOTOGRAPH 1b Morena Boulevard and West Morena Boulevard Intersection

FIGURE 2-7 **Surrounding Land Uses** Access to the project site is currently provided on West Morena Boulevard, Morena Boulevard, and Frankfort Street. The RV park is accessed by a full-access driveway on Frankfort Street, approximately 155 feet from the intersection with Morena Boulevard and a right-in/right-out driveway on Morena Boulevard, immediately east of the West Morena Boulevard/Morena Boulevard intersection. The northern project parcel is accessed by a right-in/right-out only driveway from West Morena Boulevard approximately 315 feet north of the Morena Boulevard/ West Morena Boulevard intersection.

There are existing sidewalks at the Morena Boulevard and West Morena Boulevard project frontage. No sidewalks are available at the Tonopah Avenue and Frankfort Street project frontage. A bus stop is located immediately adjacent to the project site at the intersection of Morena Boulevard and Frankfort Street. This bus stop is served by Route 10, which runs between the Old Town Transit Center and the University Town Center (UTC) Transit Center primarily via Morena Boulevard and Clairemont Drive. The Los Angeles-San Diego-San Luis Obispo rail corridor is also located west of the project site, between I-5 and Morena Boulevard.

The Mid-Coast Corridor Transit Project is currently under construction and will extend Trolley Blue Line service from the Old Town Transit Center to the University of California San Diego and Westfield UTC, providing nine new trolley stations, including at Tecolote Road and West Morena Boulevard, within walking distance of the project site. The Blue Line extension is currently under construction and is anticipated to begin service in 2021.

2.3.3 Air Quality/Climate

The project site is located within the San Diego Air Basin (SDAB), as defined by the California Air Resources Board (CARB) and San Diego Air Pollution Control District (SDAPCD). The project is located adjacent to Mission Bay and about 3 miles east of the Pacific Ocean. The eastern portion of the SDAB is surrounded by mountains to the north, east, and south. These mountains tend to restrict airflow and concentrate pollutants in the valleys and low-lying areas below.

The project site, like the rest of San Diego County, has a Mediterranean climate characterized by warm, dry summers and mild, wet winters. The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds. These winds tend to blow pollutants away from the coast toward the inland areas. Consequently, air quality near the coast is generally better than that which occurs at the base of the coastal mountain range.

The SDAPCD maintains 10 air quality monitoring stations throughout the greater San Diego metropolitan region. Air pollutant concentrations and meteorological information are continuously recorded at these stations. Measurements are then used by scientists to help forecast daily air pollution levels. Current measurements are discussed in detail in Section 4.14, Air Quality. The SDAB is currently classified as a federal non-attainment area for ozone and a state non-attainment area for particulate matter less than 10 microns (PM_{10}) and particulate matter less than 2.5 microns (PM_{2} , and a federal maintenance area for carbon monoxide (PM_{2}), and a federal maintenance area for carbon monoxide (PM_{2}).

2.3.4 Topography/Land Cover

The project site is relatively flat and elevations are near mean sea level due to its proximity to Mission Bay. The northern boundary of the project site contains a steep cut slope that ranges from approximately 5 to 25 feet in height and has likely existed since at least the early 1950s (see Figure 2-6). The project site is currently developed as a RV park with several permanent support structures. Vegetation on the project site is limited to landscaping and ornamentals.

2.3.5 Drainage

Rainfall sheet flows from north to south on the project site where it enters the Morena Boulevard curb and gutter system. Runoff from the project site enters the public storm drainpipe via two curb-and-gutter inlets at the intersection of Morena Boulevard and Frankfort Street and along Morena Boulevard. From these two inlets, the storm drain system travels northwest into a collector along West Morena Boulevard, where it then travels southwest approximately 1,500 feet until it enters Tecolote Creek. After entering Tecolote Creek, runoff travels an additional several hundred feet and then discharges into Mission Bay at the Enchanted Cove near Fiesta Island.

The southern portion of the project site is located within Federal Emergency Management Agency Zone AO, which is designated as being within the 100-year floodplain and having average flood depths of one foot. The portion of the 100-year flood zone within the project site is associated with the Tecolote Creek and can be inundated by as much as 3 feet during heavy storm events.

2.4 Public Utilities and Services

2.4.1 Water Systems

The Public Utilities Department (PUD) provides water service to the project site. The PUD maintains surface storage reservoirs, water treatment plants, and pump stations as part of their water system. The water system also includes transmission and distribution pipelines to deliver potable water to developed areas. The existing water distribution system in the project area includes an 8-inch public water main located in Frankfort Street, adjacent to the project site. This 8-inch public water main runs north-south along Frankfort Street, connecting with a 16-inch public water main located in Morena Boulevard.

2.4.2 Wastewater Systems

The PUD provides wastewater collection, treatment, and disposal services to the San Diego region through its Metropolitan Sewerage System. Existing sewer mains are located within existing utility easements along Frankfort Street, Morena Boulevard, and West Morena Boulevard. Frankfort Street contains an existing 24-inch and 6-inch sewer main. Morena Boulevard and West Morena Boulevard contain an 8-inch sewer main that connects to the 6-inch sewer main in Frankfort Street.

2.4.3 Fire Protection/Life Safety Service

Fire protection services to the project area are provided by the San Diego Fire – Rescue Department. Fire Station 25 is the closest fire station to the project site, and serves the Bay Park community within Clairemont Mesa. Emergency medical services are provided to the project site and throughout the City of San Diego through a public/private partnership between the City's Emergency Medical Services and the Rural Metro Corporation, which provides some personnel and some ambulances.

2.4.4 Police Service

Police services are provided by the San Diego Police Department. The project site is located within the boundaries of police Beat 116 of the San Diego Police Department, Northern Division. The Northern Division Police Station is located approximately 6.9 miles north of the project site at 4274 Eastgate Mall in the La Jolla community. The Northern Division serves the neighborhoods of Bay Ho, Bay Park, Clairemont Mesa East, Clairemont Mesa West, La Jolla, Mission Bay Park, Mission Beach, North Clairemont, Pacific Beach, Torrey Pines, and University City.

2.4.5 Parks/Recreational Facilities

The City has over 38,930 acres of park and open space lands that offer a diverse range of recreation opportunities. The planning area is served by four community parks, seven neighborhood parks, two turfed school parks, and two lighted ball fields on school sites. The total acreage of these facilities is 112 acres. Seven of the CMCP park facilities are located adjacent to elementary and junior high schools or former school sites that have been leased to private institutional uses. A number of school playgrounds are open to the public after school hours, which provides additional opportunities for recreation activity. Two community parks, located adjacent to Clairemont Mesa, also serve the CMCP.

2.4.6 Library and School Facilities

The project site is located in the San Diego Unified School District, within the school boundaries for Bay Park Elementary School, Marston Middle School, and Clairemont High School. Additionally, School of the Madeleine, a private Catholic school serving preschool through eighth grade students, private Francis Parker School serving junior kindergarten to twelfth grade students, and Mark Twain Senior High alternative high school are also located near the project site. The City operates a central library located in downtown San Diego and 35 branch libraries in neighborhoods throughout the City. The closest libraries to the project area are the Clairemont Library located at 2920 Burgener Boulevard and the Linda Vista Library located at 2160 Urlich Street.

2.5 Planning Context

Development projects in the City are generally guided by the City's General Plan, and more specifically, by the applicable community plan. In addition, various other City, regional, and state

plans, programs, and ordinances regulate the development of land within San Diego. A brief description of each is provided below. A detailed evaluation of the project's consistency with relevant plans and ordinances is provided in Section 4.1, Land Use, of this EIR.

General Plan: The City's General Plan sets forth a comprehensive long-term plan for development within the City. The General Plan incorporates a City of Villages strategy, which redirects development to areas with available urban amenities and includes the following 10 elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; Historic Preservation; and Housing.

Clairemont Mesa Community Plan: The CMCP contains community-specific development objectives and policies that are refinements of citywide policies contained in the General Plan. The CMCP identifies the project site as being within a Mobile Home Park Overlay Zone (although the site contains an RV Park, not a Mobile Home park). As detailed in Section 3.4 the project would require a General Plan Amendment and a Community Plan Amendment to change the land use designation to Medium Density Residential (15 to 30 dwelling units per acre) and remove the CMCP Mobile Home Park Overlay.

Draft Morena Corridor Specific Plan: The Morena Corridor Specific Plan is a current planning effort to identify policies and recommendations addressing mobility and urban design to enhance the Morena Boulevard corridor. The planning area covers approximately 300 acres bounded by Gesner Drive to the north, I-5 to the west, and Friars Road to the south, including the project site. This plan is expected to build upon the findings of the Morena Boulevard Station Area Planning Study that provided planning recommendations for the areas adjacent to the planned Mid-Coast trolley stations at Tecolote Road and Clairemont Drive.

Land Development Code (Municipal Code): The City's Municipal Code contains all the adopted ordinances for the City. Chapters 11 through 15 are known collectively as the Land Development Code and include applicable development regulations for the base zones of a project site, as well as supplemental development regulations contained within the applicable overlay zones.

San Diego Airport Land Use Compatibility Plan (ALUCP): The purpose of an ALUCP is to provide for the orderly growth of airports and the areas surrounding the airports, and to safeguard the general welfare of inhabitants within an airport's vicinity. The project is located approximately 2.56 miles north of the San Diego International Airport. Although not located within the flight path, the project site is located within Review Area 2 of the ALUCP.

Air Quality Plans: Air quality plans provide an overview of the region's air quality and identify the pollution-control measures needed to expeditiously attain and maintain air quality standards. The region's plans include the San Diego Regional Air Quality Strategy (RAQS), addressing state requirements, and the San Diego portion of the California State Implementation Plan (SIP), addressing federal requirements.

Water Quality Control Plan: The Water Quality Control Plan for the San Diego Basin designates beneficial uses for water bodies in the San Diego region, and establishes water quality objectives and implementation plans to protect those beneficial uses.

San Diego Forward: The Regional Plan: The San Diego Association of Governments is the regional authority that creates region-specific documents to provide guidance to local agencies. The Regional Plan combines two of the region's existing planning documents: the Regional Comprehensive Plan for the San Diego Region and the Regional Transportation Plan/Sustainable Communities Strategy.

City of San Diego Climate Action Plan: The City of San Diego Climate Action Plan (CAP) identifies measures to meet greenhouse gas (GHG) reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a business-as-usual projection for emissions at 2020 and 2035, state targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency. As a means to implement the CAP, the City created a Consistency Checklist utilized by projects to ensure compliance with the measures identified in the CAP.

3

Chapter 3.0 Project Description

3.1 Project Background and Planning Context

The project would develop a 6.21-acre project area (5.73-acre project site and 0.48-acre off-site improvements and right-of-way dedication) with 150 multi-family units within the Clairemont Mesa Community Plan (CMCP) area, adjacent to Morena Boulevard. The project would require approval of a Community Plan Amendment to allow for higher residential densities than currently allowed under the existing CMCP, but would be developed consistent with the adopted CMCP height restrictions for this area. Proposed densities are intended to provide transit supportive land uses within a transit priority area, consistent with the City of San Diego (City) General Plan City of Villages Strategy and Climate Action Plan. The project would allow for increased residential density in anticipation of completion of the Mid-Coast Corridor Transit Project that would result in an extension of trolley service from Downtown to University City, including a trolley stop at Tecolote Road, located just south of and within walking distance of the project site. The trolley extension is currently under construction and is anticipated to be operational in 2021 (SANDAG 2017). Although it is anticipated that higher density land uses would ultimately be approved as part of a comprehensive CMCP update, this project proposes a stand-alone community plan amendment to allow higher density residential development in advance of the CMCP update. Additionally, the project site is located within the Draft Morena Corridor Specific Plan area which is intended to provide policies and recommendations that address mobility and urban design to enhance growth along the Morena Boulevard corridor.

3.2 Project Objectives

In accordance with the California Environmental Quality Act Guidelines Section 15124, the following primary objectives support the purpose of the project, assist the lead agency in developing a reasonable range of alternatives to be evaluated in this EIR, and ultimately aid decision-makers in

preparing findings and overriding considerations, if necessary. The primary project objectives are as follows:

- Provide housing to accommodate increasing growth in the region.
- Enhance the visual character of the site as viewed from Morena Boulevard.
- Provide development that is consistent with the City of Villages and Smart Growth principles.
- Develop the site consistent with the scale and character of development in the surrounding area and the CMCP area.

3.3 Project Characteristics

3.3.1 Development Summary

The project requires a General Plan Amendment to amend the Land Use and Street System Map to identify the site as entirely Residential, and a Community Plan Amendment to the CMCP to remove the mobile home park overlay and apply a medium density residential designation to the site, which would permit 15 to 30 dwelling units per acre. Additionally, the project requires approval of: a rezone from the RS-1-7 and CC-4-2 zones to the RM-2-5 zone; a Vesting Tentative Map to consolidate parcels and dedicate public right-of-way; a Planned Development Permit to allow for deviations to the retaining wall height regulations; deviations from the setback regulations to allow carports and trash enclosures to be located within the northern property line setback, allowing the clubhouse building to encroach into the front yard setback and building #6 to encroach into the side yard along Morena Boulevard; and deviation from the 7-foot horizontal dimension along one plane for assigned unit storage. Additionally, a Site Development Permit is required due to the location of the project within a special flood hazard area, which qualifies as Environmentally Sensitive Lands.

The project includes development of 150 multi-family dwelling units that would be made available for rent on a 5.73-acre project site located just east of Morena Boulevard, west of Frankfort Street, and south of Tonopah Avenue (1577-79 Morena Boulevard) within the CMCP area of the City. The project site includes two parcels (Assessor Parcel Numbers 436-020-40 and 436-020-41). An additional 0.48 acre would be dedicated as street right-of-way along West Morena Boulevard, Morena Boulevard, and Frankfort Street. Refer to Figures 2-1 through 2-3 for the regional location, project location on a U.S. Geological Survey map, and an aerial photograph of the project vicinity, respectively.

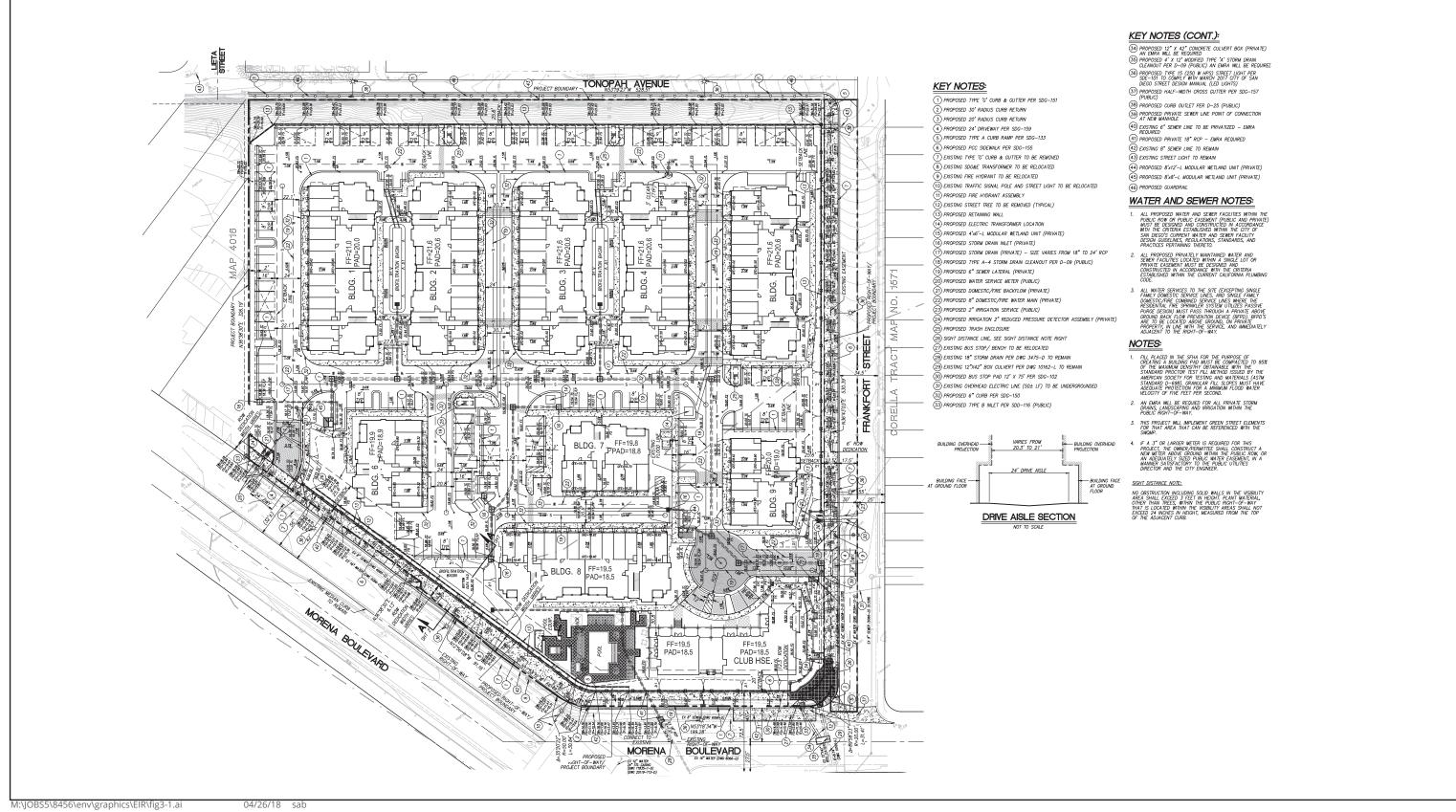
The project includes removal of the existing Coastal Trailer Villa recreational vehicle (RV) park, removal of the truck/RV storage use and demolition of existing residences on the northern project parcel, and construction of 150 multi-family residences (apartments) with on-site amenities, as shown on the project site and grading plan (Figure 3-1) and architectural site plan (Figure 3-2) and summarized in Table 3-1. The apartments would be developed at a density of 26.3 dwelling units per acre and would be accommodated in nine, three-story buildings surrounded by a landscape perimeter and open space areas and with access to private on-site recreational amenities including a clubhouse and a pool. Building heights would be within allowable height limits (30 feet) as required under the CMCP. Refer to Figures 3-3a through 3-3c for exterior elevations of the proposed structures.

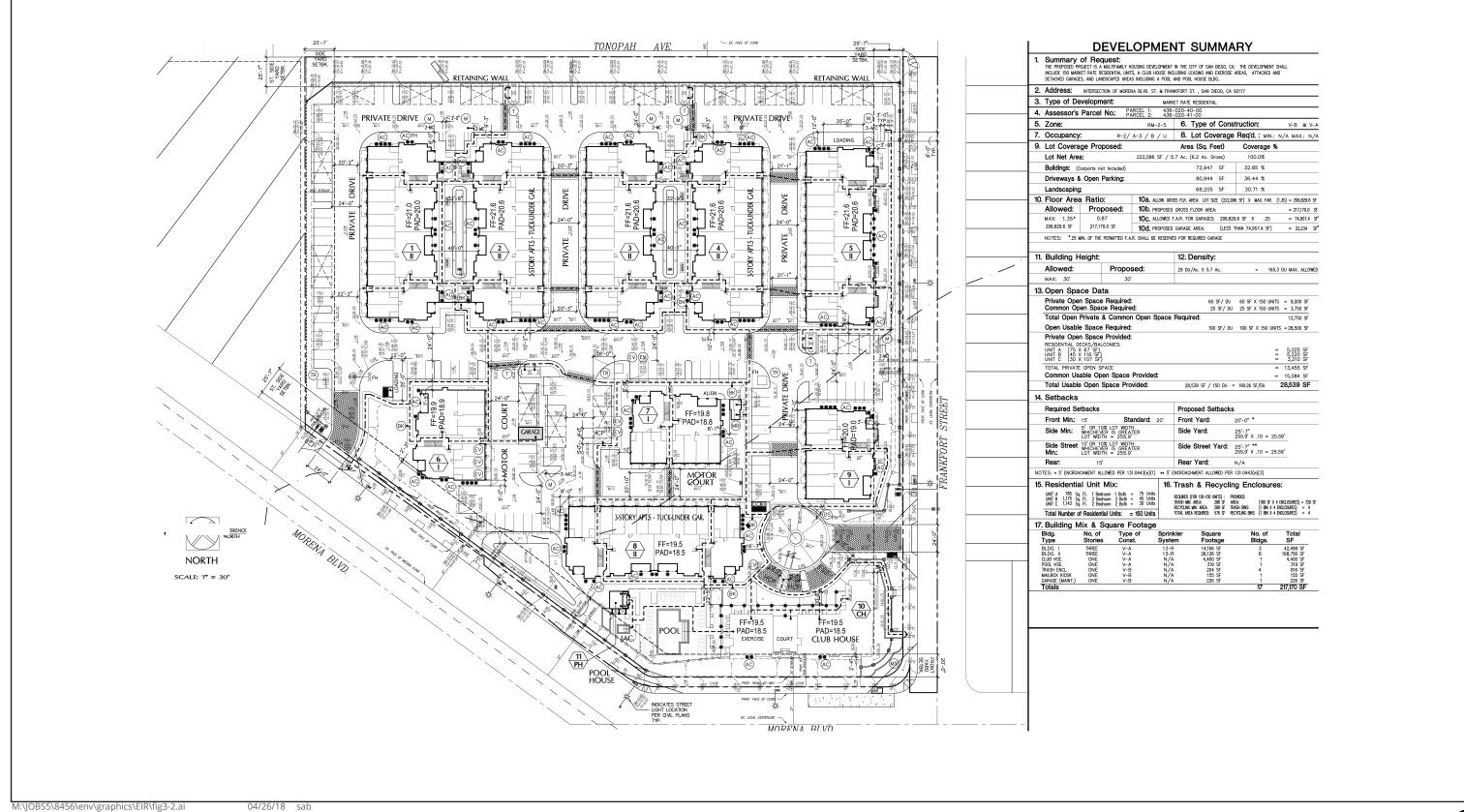
Table 3-1 Project Development Summary		
Land Use	Quantity	
Multi-family Residential Units Unit A - 75 – 1 bed/1 bath (785 sf) Unit B - 45 – 2 bed/2 bath (1,175 sf) Unit C - 30 – 2 bed/2 bath (1,143 sf)	150 units (211,254 sf in 9, 3-story buildings)	
Clubhouse (leasing/reception area, club room, fitness center, restrooms)	4,400 sf	
Pool house (pool restrooms)	319 sf	
sf = square feet		

3.3.2 Private Recreational Facilities and Open Space

The project would provide private and common open space areas for residents consistent with City Municipal Code requirements as detailed in Table 3-2. Private recreational facilities include a clubhouse, fitness center, and pool area. The clubhouse would include a manager office and business center for leasing services associated with the apartment complex. A club room, restrooms and lounge room with kitchen amenities would be available for tenant use. A fitness center with restrooms would also be provided for future tenants. A pool area with a pool, spa, fire pit, lounge chairs, and a pool house (restrooms) would also be provided on-site just west of the fitness center. These amenities would be surrounded by landscaping and would be located at the southern end of the site adjacent to Morena Boulevard.

Table 3-2 Project Open Space Summary		
	Open Space	
Туре	(square feet)	
Common Usable Open Space	15,084	
- Courtyard areas	(8,598)	
 Recreational Area (pool, gym, recreation room, clubhouse courtyard) 	(6,486)	
Private Residential Decks/Balconies 13,455		
Total Usable Open Space	28,539	





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TYPICAL EXTERIOR ELEVATION

BUILDING TYPE I



EXTERIOR ELEVATION 4 - WEST SIDE

BUILDING TYPE I - BLDG. NO. 6

TYPICAL EXTERIOR FINISHES

- T.P.O. ROOFING AT FLAT ROOF AREAS
- EXTERIOR STUCCO WALL FINISH
 STUCCO OR WOOD WINDOW/DOOR/WALL TRIM
- WOOD WINDOW TRELLIS
- GALVANIZED METAL SCUPPERS
 EXPOSED WOOD TRELLIS MEMBERS
 METAL CLAD EXTERIOR DOORS
- METAL CLAD FRENCH DOORS

- MEIAL CLAD FRENCH DUORS
 VINTY, FRAMED WINDOWS
 METAL BALCONY RAILINGS
 METAL CHIMNEY CAPS W/ B-VENTS PAINTED
 INSULATED SECTIONAL RAISED PANEL
 METAL GARAGE DOOR PAINTED

EXTERIOR COLORS

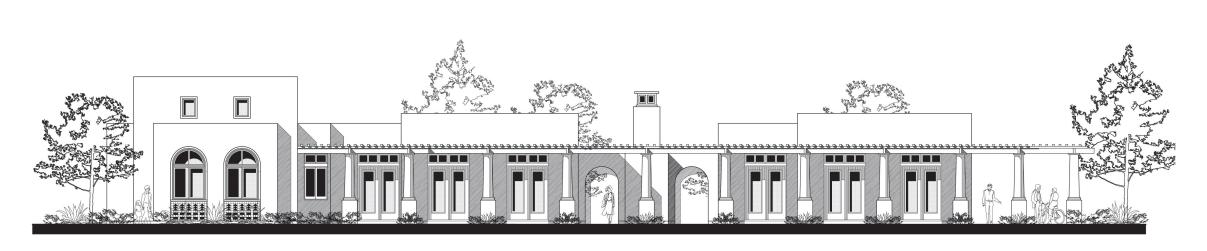
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 SUCH AS:
 WARM GRAY
 WARM SIENNA COLOR
 BURNT OCHRE EARTH TONE
 WARM / OFF-WHITES
 EARTH GREEN / OLIVE
 WARM CHARCOAL
- METAL RAILINGS ACCENT COLOR RANGE,

- METAL RAILINGS ACCENT COLOR I
 SUCH AS:
 SLATE ORANGE / VERMILION
 SLATE GREEN / SAGE
 CLEAR ALUMINUM
 WARM / OFF-WHITES



TYPICAL EXTERIOR ELEVATION

BUILDING TYPE II



EXTERIOR ELEVATION 1

CLUBHOUSE



EXTERIOR ELEVATION 2

CLUBHOUSE SCALE: 3/16" = 1'-0"

TYPICAL EXTERIOR FINISHES

- . T.P.O. ROOFING AT FLAT ROOF AREAS
- EXTERIOR STUCCO WALL FINISH
 STUCCO OR WOOD WINDOW/DOOR/WALL TRIM
- GALVANIZED METAL SCUPPERS
 EXPOSED WOOD TRELLIS MEMBERS
 METAL CLAD EXTERIOR DOORS

- METAL CLAD FRENCH DOORS
 VINYL FRAMED WINDOWS
 METAL BALCONY RAILINGS
 METAL CHIMNEY CAPS W/ B-VENTS PAINTED
- INSULATED SECTIONAL RAISED PANEL METAL GARAGE DOOR PAINTED
- 40-YEAR CLASS 'A' FACTORY- PAINTED STA SEAM METAL ROOFING

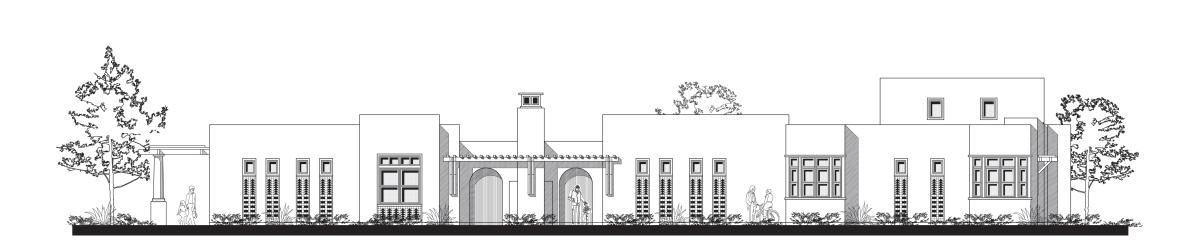
EXTERIOR COLORS

- THE EXTERIOR STUCCO COLOR RANGE, SUCH AS:
 WARM GRAY
 WARM SENNA COLOR
 BURNT OCHRE EARTH TONE
 WARM / OFF-WHITES
 EARTH GREN / OLIVE
 WARM CHARCOAL

- METAL RAILINGS ACCENT COLOR RANGE,
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 SUCH AS:
 SLATE ORANGE / VERMILION
 SLATE GREEN / SAGE
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 WARM / OFF-WHITES

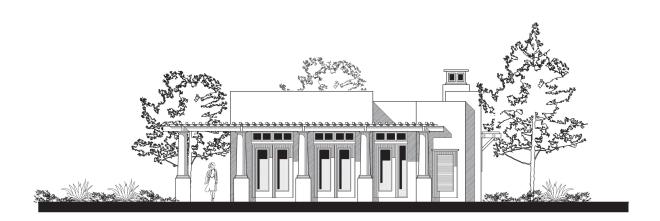
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EXTERIOR ELEVATION 3

CLUBHOUSE



EXTERIOR ELEVATION 4

CLUBHOUSE SCALE: 3/16" = 1'-0"

TYPICAL EXTERIOR FINISHES

- . T.P.O. ROOFING AT FLAT ROOF AREAS
- EXTERIOR STUCCO WALL FINISH STUCCO OR WOOD WINDOW/DOOR/WALL TRIM
- WOOD WINDOW TRELLIS
- GALVANIZED METAL SCUPPERS
 EXPOSED WOOD TRELLIS MEMBERS

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 METAL BALCONY RAILINGS
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- INSULATED SECTIONAL RAISED PANEL METAL GARAGE DOOR PAINTED
 40-YEAR CLASS 'A' FACTORY- PAINTED STA SEAM METAL ROOFING

EXTERIOR COLORS

- THE EXTERIOR STUCCO COLOR RANGE, SUCH AS:
 WARM GRAY
 WARM SIENNA COLOR
 BURNT OCHRE EARTH TONE
 WARM / OFF-WHITES
 EARTH GREEN / OLIVE
 WARM CHARCOAL

- METAL RAILINGS ACCENT COLOR RANGE, METAL RAILINGS ACCENT COLOR
 SUCH AS:
 SLATE ORANGE / VERMILION
 SLATE GREEN / SAGE
 CLEAR ALUMINUM
 WARM / OFF-WHITES

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3.3.3 Landscape Design

The overall landscape plan is shown in Figure 3-4a with detail landscape concepts provided in Figures 3-4b and 3-4c. An approximate 10-foot-wide landscaped area would be provided around all proposed structures on the project site and landscaping would be installed around the project perimeter at street frontages. A pedestrian entrance with enhanced paving and an entry monument wall would be provided at the corner of Morena Boulevard and Frankfort Street. An American with Disabilities Act compliant pedestrian ramp would also be accessible from that location. The project would be consistent with all City requirements relating to minimum planting and landscaped area requirements and would install drought-tolerant landscaping requiring very low water use, in addition to some medium water use landscaping.

The project design includes a Mediterranean landscaping theme, retaining walls, decorative walls, and noise attenuating walls/fencing around the perimeter of the project site as depicted on Figure 3-5. Along the street frontages, a 6-foot-high combination theme wall would be installed that includes a 2-foot-high wall with stucco to match the project architecture combined with 4-foot-high decorative fencing. The wall is designed with articulation through the use of pilasters. Shrubbery would be utilized to mask the combination theme wall, which would include cascading shrubs as well as screening shrubs down the wall to help screen and provide additional visual interest to the wall. In addition, screening vines would be utilized to further screen the wall. A 6-foot-high combination stucco and glass wall would be installed around the pool and recreational areas in order to attenuate road noise at outdoor use areas. A 6-foot-high block wall would be installed at the northwest property line bordering the adjacent property. At the northeastern property line at the bottom of the slope below Tonopah Avenue, an 18-foot-high split face block retaining wall with an additional 42 inches of cable guardrail fencing would be installed to support the existing slope. The base of the wall would be planted with shrubs that would climb and screen the wall with vegetative material. At the top of the slope at Tonopah Avenue, a new 6-foot-high tube steel fence would be installed to replace the existing chain link fence.

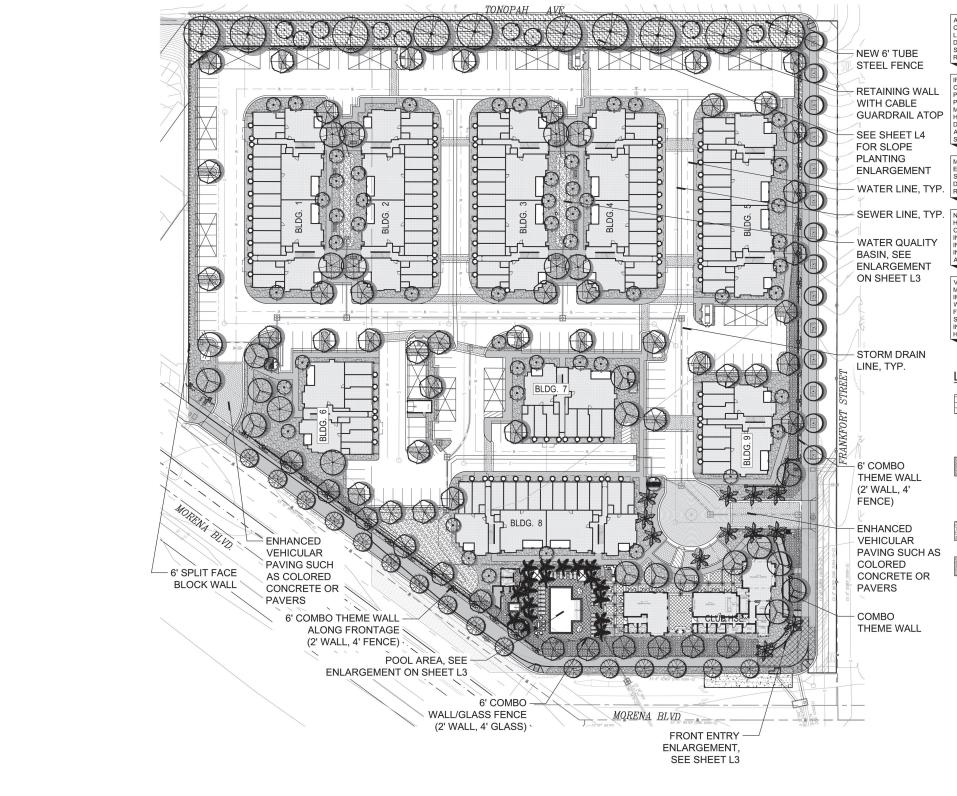
3.3.4 Parking

Based on the proposed multi-family residential use, total parking requirements for the site would be 263 vehicular parking spaces, 1 accessible space, 68 bicycle parking spaces, and 15 motorcycle spaces. The project would provide parking in excess of City requirements, as detailed in Table 3-3.

Table 3-3 Parking Summary			
Type	Required Spaces	Spaces Provided	
Vehicular Parking	263 spaces 1 accessible space	 267 spaces total 99 attached garages 52 detached carports (includes 1 accessible) 115 open spaces (includes 2 accessible) 1 detached garage/maintenance 	
Motorcycle Parking	15	16 spaces	
Bicycle Parking	68	70 spaces (10 bike racks located throughout)	

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08/22/17 sab



ALL LANDSCAPE AND IRRIGATION SHALL ALL LANDSCAPE AND IRRIGATION SHALL CONFORM TO THE STANDARDS OF THE CITY-WIDI LANDSCAPE REGULATIONS AND THE CITY OF SAN DIEGO LAND DEVELOPMENT MANUAL LANDSCAPE STANDARDS AND ALL OTHER LANDSCAPE RELATED CITY AND REGIONAL STANDARDS.

RRIGATION: AN AUTOMATIC, ELECTRICALLY IRRIGATION: AN AUTOMATIC, ELECTRICALLY CONTROLLED IRRIGATION SYSTEM SHALL BE PROVIDED AS REQUIRED BY LDC 142.0403(C) FOF PROPER IRRIGATION, DEVELOPMENT, AND MAINTENANCE OF THE VEGETATION IN A HEALTHY, DISEASE-RESISTANT CONDITION. THE DESIGN OF THE SYSTEM SHALL PROVIDE ADEQUATE SUPPORT FOR THE VEGETATION OF THE VEGETATION.

MULCH: ALL REQUIRED PLANTING AREAS AND ALL EXPOSED SOIL AREAS WITHOUT VEGETATION SHALL BE COVERED WITH MULCH TO A MINIMUM DEPTH OF 3 INCHES, EXCLUDING SLOPES REQUIRING REVEGETATION PER SDMC 142.0411.

NO FENCES/SHRUBS GREATER THAN 36 INCHES IN HEIGHT ARE PERMITTED IN THE VISIBILITY AREAS OF THE PROPOSED DRIVEWAYS AND STREET INTERSECTIONS. NO WALLS HIGHER THAN 36 INCHES AND NO VEGETATION HIGHER THAN 24 NCHES WILL BE PROPOSED IN THE VISIBILITY

VEGETATION SHALL BE SELECTED AND MAINTAINED IN SUCH A MANNER AS TO ALLOW IMMEDIATE ACCESS TO ALL HYDRANTS, WINDOWS, AND OTHER DEVICES OR AREAS USED FOR FIREFIGHTING PURPOSES, VEGETATION SHALL NOT OBSTRUCT ADDRESS NUMBERS OR INHIBIT THE FUNCTIONING OF ALARM BELLS, HORNS OR STROBES.

MINIMUM TREE SEPARATION DISTANCE MINIMUM TREE SEPARATION DISTANCE:
TRAFFIC SIGNALS/STOP SIGNS - 20'
UNDERGROUND UTILITY LINES - 5'
SEWER UTILITY LINES - 10'
ABOVE GROUND UTILITY STRUCTURES - 10'
DRIVEWAY ENTRIES - 10'
INTERSECTIONS (INTERSECTING CURB LINES OF TWO STREETS) - 2'
HE FOR BESTENBAY ALL STREETS PLATES GAMEN OR I ONLINES

NO TREES OR SHRUBS EXCEEDING 3' IN HEIGHT AT MATURITY SHALL BE INSTALLED WITHIN 5' OF ANY PUBLIC WATER FACILITIES OR WITHIN 10' OF ANY PUBLIC SEWER FACILITIES.

5' FOR RESIDENTAIL STREETS RATED 25MPH OR LOWER

A MINIMUM ROOT ZONE OF 40 SF IN AREA SHALL BE PROVIDED FOR ALL TREES. THE MINIMUM DIMENSION FOR THIS AREA SHALL BE 5 FEET, PER SDMC 142.0403(B)(5).

TREE ROOT BARRIERS SHALL BE INSTALLED WHERE TREES ARE PLACED WITHIN 5 FEET OF PUBLIC IMPROVEMENTS INCLUDING WALKS, CURBS, OR STREET PAVEMENTS OR WHERE NEW PUBLIC IMPROVEMENTS ARE PLACED ADJACENT TO EXISTING TREES. THE ROOT BARRIER WILL NOT WRAP AROUND THE ROOT

MAINTENANCE: ALL REQUIRED LANDSCAPE AREAS SHALL BE MAINTAINED BY THE PROPERTY OWNER. LANDSCAPE AND IRRIGATION AREAS IN THE PUBLIC RIGHT-OF-WAY SHALL BE IRRIGATION AREAS IN THE PUBLIC RIGHT 10-WAY SHALL BE MAINTAINED BY THE PROPERTY OWNER. THE LANDSCAPE AREAS SHALL BE MAINTAINED FREE OF DEBRIS AND LITTER, AND ALL PLANT MATERAL SHALL BE MAINTAINED IN A HEALTHY GROWING CONDITION. DISEASED OR DEAD PLANT MATERIAL SHALL BE SATISFACTORILY TREATED OR REPLACED PER THE CONDITIONS OF THE PERMIT.

LEGEND

PERMANENT REVEGETATED AND IRRIGATED SLOPE PLANTING

2:1 SLOPE OVER 15' IN HEIGHT

AREA TO RECEIVE HYDROSEED MIX AND DROUGHT TOLERANT TREES AND SHRUBS PLANTED AT A MINIMUM RATE OF ONE PLANT PER 100SF WITH AN AUTOMATIC, BELOW GRADE, PERMANENT IRRIGATION SYSTEM. WILL BE MAINTAINED BY THE PROPERTY OWNER. SEE SHEET L2 FOR PLANT LIST.

PERMANENT VEGETATED AND IRRIGATED SLOPE PLANTING 2:1 SLOPE UNDER 15' IN HEIGHT

AREA TO RECEIVE DROUGHT TOLERANT GROUNDCOVER CONSISTING OF

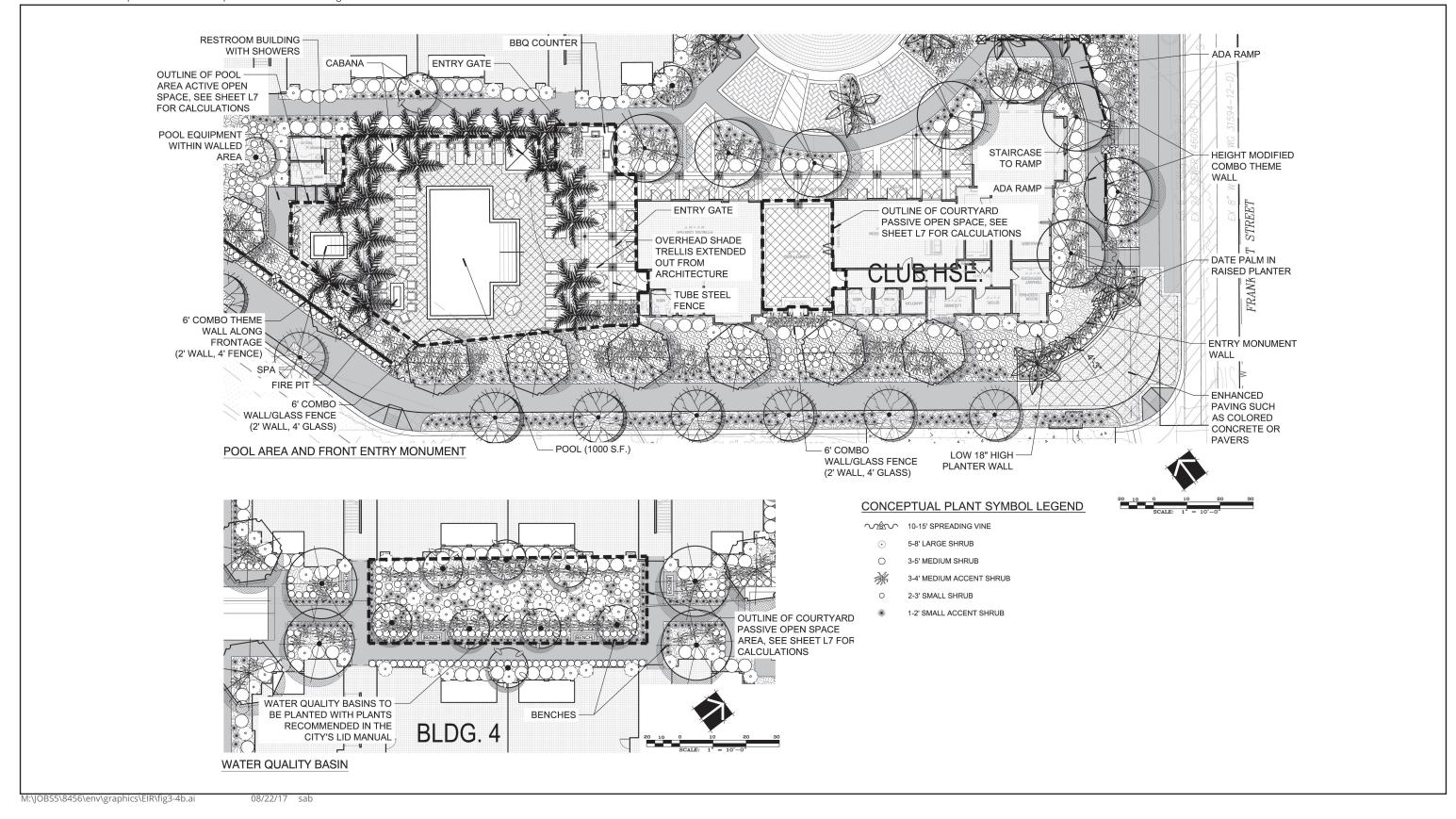
ROOTED CUTTINGS WITH AN AUTOMATIC, BELOW GRADE, PERMANENT IRRIGATION SYSTEM. WILL BE MAINTAINED BY THE PROPERTY OWNER. SEE SHEET L2 FOR PLANT LIST.

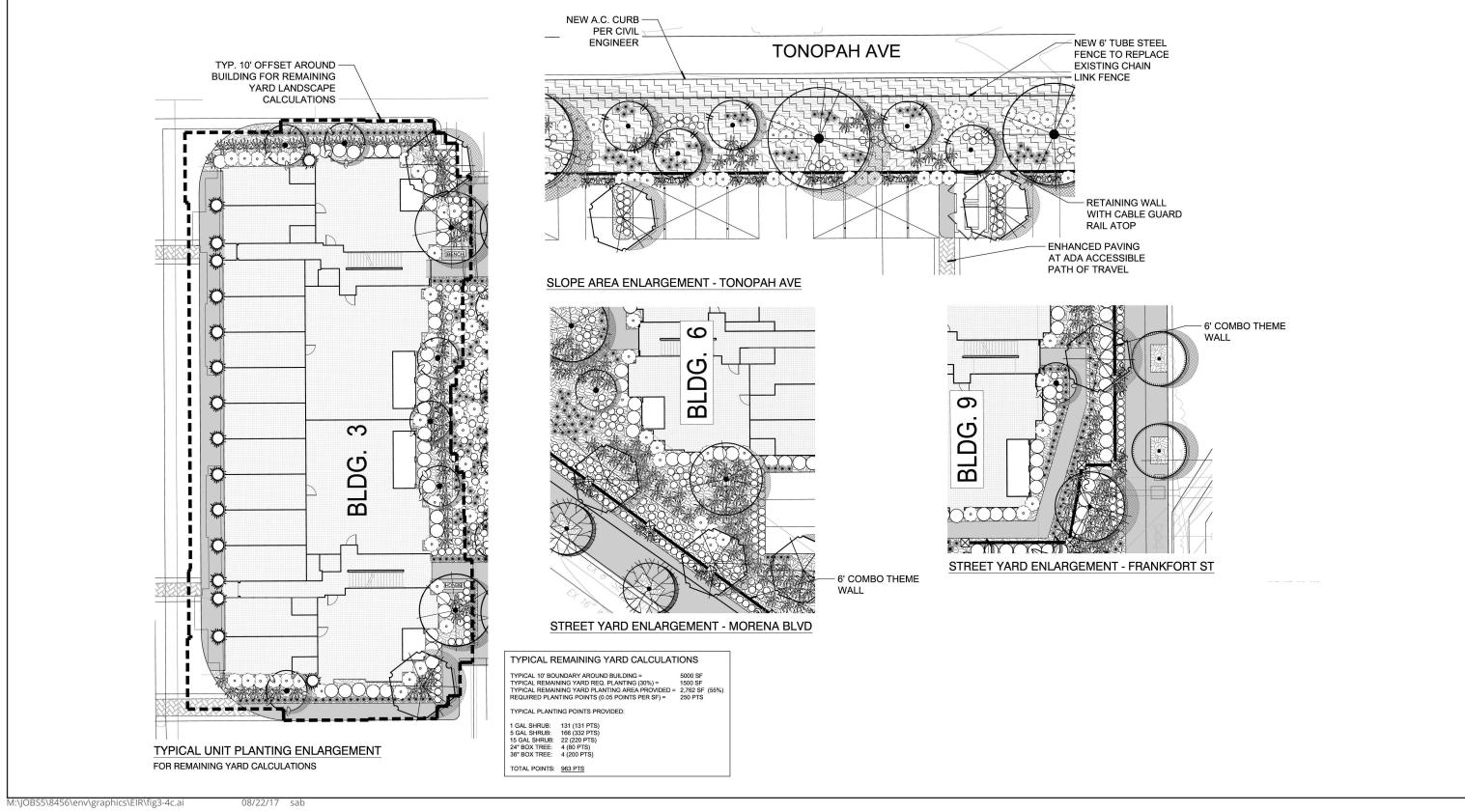
WATER QUALITY BASIN AREA

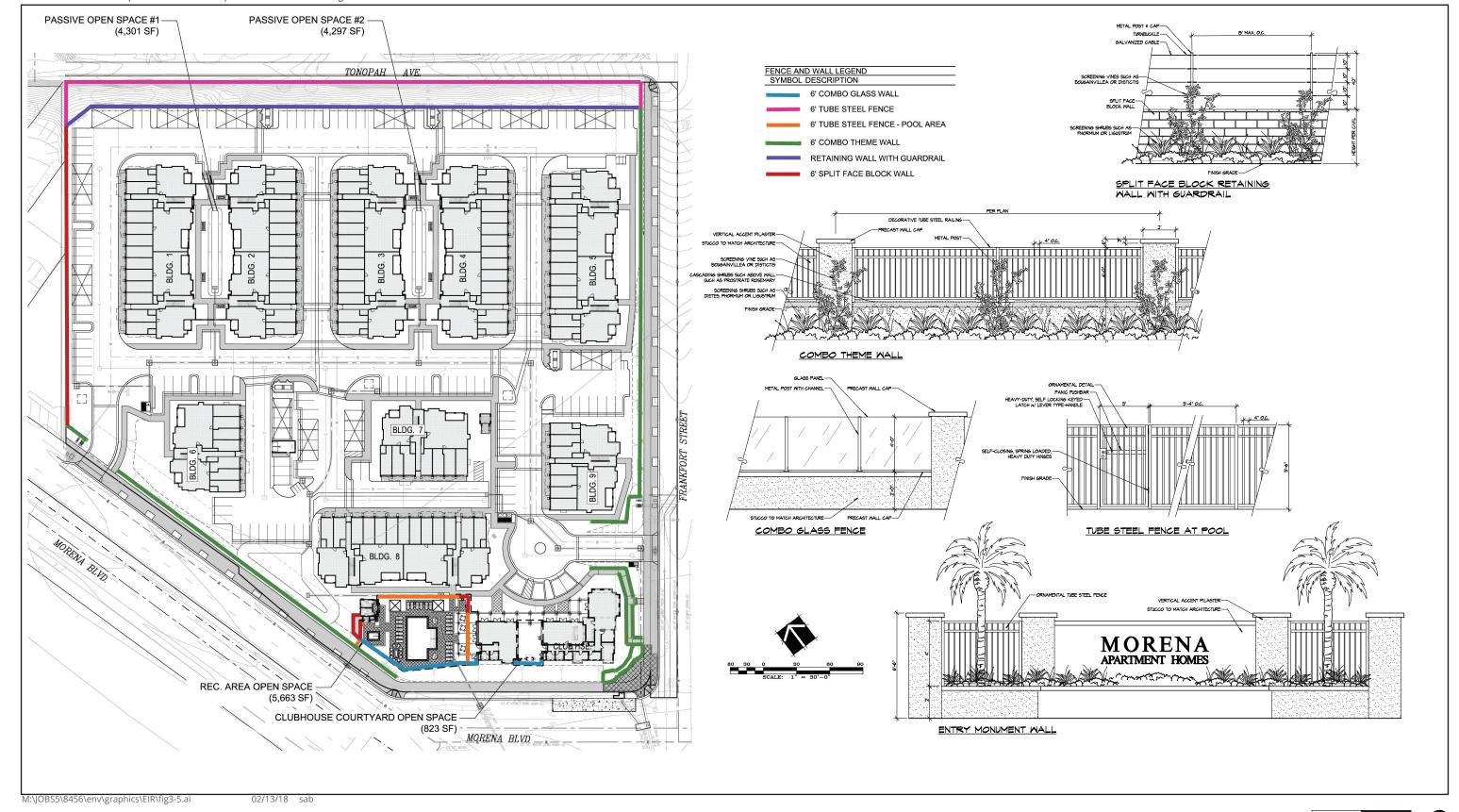
REFER TO CIVIL ENGINEER'S SHEET 2 FOR DETAIL. SEE SHEET L2 FOR PLANT

HOA LANDSCAPING

LANDSCAPE AREAS INSTALLED BY DEVELOPER AND MAINTAINED BY THE







3.3.5 Access, Circulation, and Mobility

The main project access would be from a full-access driveway on Frankfort Street, at the same location as the existing Frankfort Street access driveway. A right-in/right-out only driveway would also provide site access from Morena Boulevard, in the same location as the existing northernmost driveway. The existing access driveway closer to the intersection of Morena Boulevard and West Morena Boulevard would be closed.

The project includes installation of appropriate half-width frontage improvements to provide pedestrian facilities and curb and gutter improvements at road frontages (Figure 3-6). Existing sidewalks along the half-width frontage of Morena Boulevard and West Morena Boulevard would be removed and replaced with new sidewalks, curb and gutter, and landscaping.

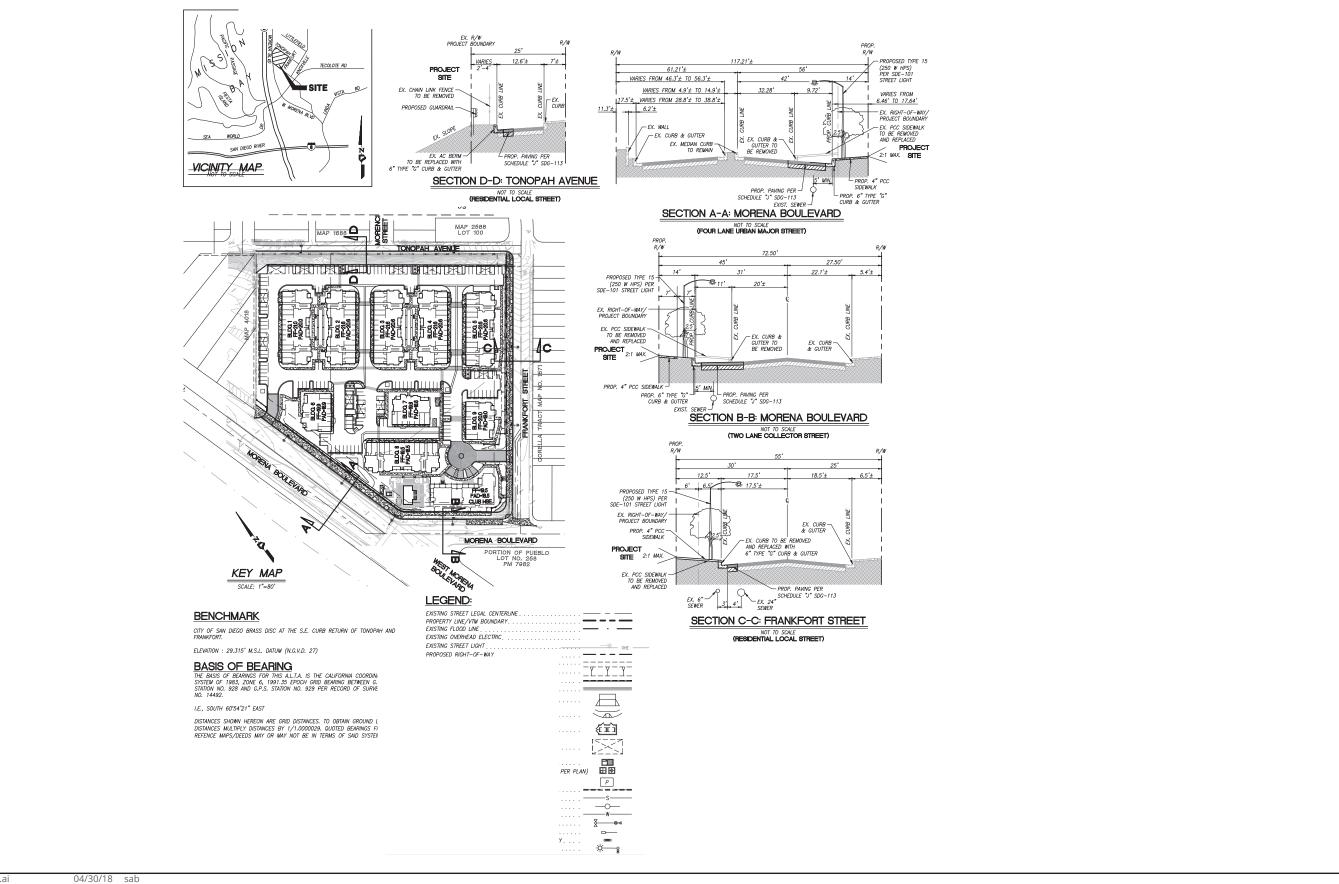
Along Frankfort Street where there are no existing sidewalks, a new sidewalk, curb and gutter, and landscaping would be installed. Curb and gutter would also be installed along Tonopah Avenue, at the top of the slope above the project site and the existing street width would be maintained. A sidewalk would not be installed at Tonopah Avenue as no pedestrian traffic from the project site is anticipated due to the road's location. In addition, constraints associated with the existing slope make road widening for sidewalk installation impractical.

Roadways internal to the project site would be 24 feet wide and would accommodate fire and emergency vehicles. Internal walkways are provided throughout the project site providing access to on-site amenities and providing pedestrian connections to the surrounding roadways. The main pedestrian access point including an accessible ramp would be at the corner of Morena Boulevard and Frankfort Street. An additional pedestrian walkway provides access to Morena Boulevard near the right-in/right-out driveway.

Half-width frontage improvements to Morena Boulevard along the east side (northbound direction) would incorporate a buffered Class 2 bike lane. The bike lane would be 6 feet wide and would be buffered from travel lanes by a 3-foot-wide bike lane buffer.

An existing bus stop serving Route 105 is located on Morena Boulevard immediately adjacent to the project site. Roadway improvements would require temporary removal of the bench at this bus stop, which would be relocated to the same general area after the frontage improvements are complete. Additionally, the project would install the following improvements at the transit stop:

- A concrete bus pad (12 feet wide by 75 feet long) on Morena Boulevard; and
- Convenience features such as a bus shelter and trash can.



3.3.6 Project Grading and Construction

Figure 3-7 shows site cross sections of the existing and proposed grade of the project site. Project grading would cover the entire 5.73 acres (100 percent of the project site) in addition to 0.48-acre of off-site areas within the project frontage where half-width road improvements would be installed and right-of-way dedications would be provided to the City. Project grading would include 10,500 cubic yards of cut at a maximum depth of 9 feet and 11,800 cubic yards of fill at a maximum depth of 7 feet. Approximately 1,000 cubic yards of import soil would be required. Maximum height of cut and fill slopes would be 8 feet at 2:1 ratio. Project construction is anticipated to last for 18 months.

3.3.7 Infrastructure

3.3.7.1 Drainage

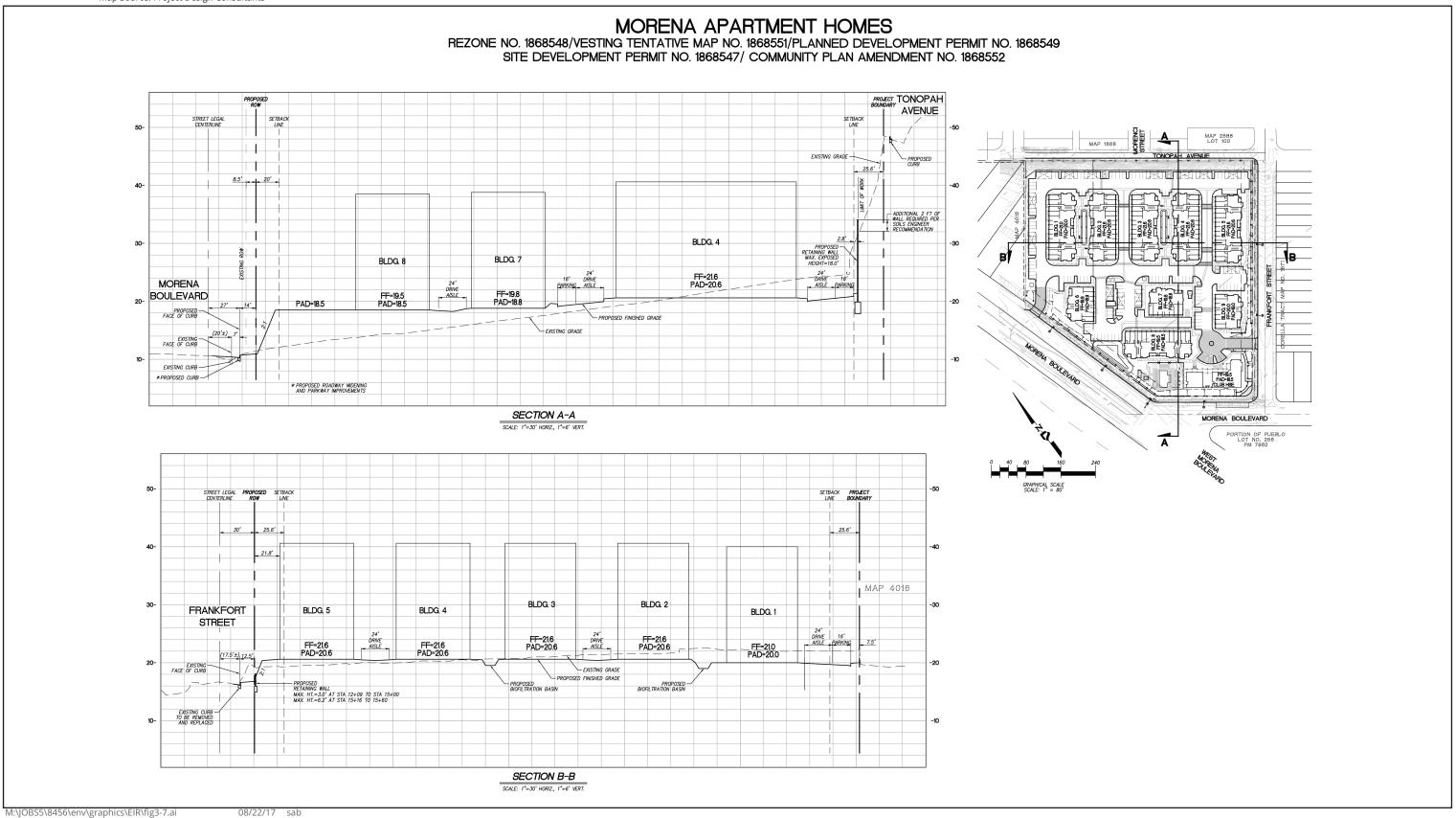
The site would be graded in order to flatten out the site and raise it above the floodplain. The proposed drainage condition would remain similar to the existing condition with the addition of curb and gutters and a private storm drain system that would route water into biofiltration basins serving as stormwater best management practices (BMPs), and off-site into the public storm strain system. Proposed treatment BMPs include one large and two small biofiltration basins and three modular wetland units. Connection to the public storm drain would be the same as existing conditions with one inlet at the corner of Morena Boulevard and Frankfort Street and another along Morena Boulevard.

The proposed water quality BMPs for the project would treat anticipated pollutants to the maximum extent practicable prior to discharge. Bioretention basins and proprietary devices (modular wetlands) would be utilized to meet the requirements of the City's storm water standards.

3.3.7.2 Water

The project would include installation of 8-inch domestic water mains in private drives throughout the project site that would connect to the existing 8-inch public water main in Frankfort Street at two connection points. The first connection point would occur at the main project site entryway along Frankfort Street where the private water main would pass through a domestic backflow system and a public water meter before connecting to the existing 8-inch public water main in Frankfort Street. The second connection point would occur at the project site entryway along Morena Boulevard where the proposed private water main would pass through a second domestic backflow system and a public water meter before connecting to the existing 16-inch public water main in Morena Boulevard.

The private water systems would be designed and constructed in accordance with the criteria established within the current California Building Code, and any proposed water facilities within the public right-of-way or public easement would be designed and constructed in accordance with the criteria established within the City's current water and sewer facility design guidelines, regulations, standards and practices.



3.3.7.3 Wastewater

Sewage from the project would be collected through a series of private 6-inch collector laterals located within the private on-site drives throughout the project site, connecting to the 6-inch public sewer main in Frankfort Street. Sewer facilities have been designed in accordance with the Sewer Design Guide prepared by the City Metropolitan Wastewater Department. The sewer system would utilize gravity flow (i.e., there are no pump stations included in the proposed design). On-site sewer mains would be private, and the existing 6-inch sewer line in Frankfort Street would be converted to a private line with an Encroachment Maintenance and Removal Agreement, since it only serves the project site. The proposed on-site sewer system has been designed in accordance with the California Uniform Plumbing Code.

The existing 8-inch sewer main in West Morena Boulevard and Morena Boulevard will remain in place. The project was designed to allow for a 5-foot distance from face of curb to sewer main to allow for future repairs/trenching without disturbing the constructed curb and gutter.

3.3.7.4 Utilities/Services

San Diego Gas & Electric would provide electricity and natural gas to the project. Utilities necessary to serve the proposed uses would be installed in conjunction with development of the site. Improvements to electricity, natural gas, and communication systems infrastructure would take place within streets in proximity to existing facilities.

The project would be served by the City Fire-Rescue Department (SDFD). The project would be designed to be consistent with the California Fire Code as adopted by the City. Fire hydrants and fire access lanes would be installed consistent with SDFD requirements and hydrants would conform to all placement and identification regulations.

3.3.7.5 Solid Waste

The project would generate solid waste during construction and operation. A Waste Management Plan (WMP) has been drafted for the project, which outlines strategies to incorporated into the project design that would minimize waste generation. As discussed in the WMP, the project would provide four trash/recycling enclosures located throughout the project area. Each enclosure would accommodate one trash bin and one recycling bin in a total of 204 square feet. Total area on-site for trash and recyclable material storage space would be 816 square feet. Trash bins with a recycling receptacle would be provided throughout all common areas. Waste and recycling would be picked up by a waste management company consistent with the City Land Development Code requirements. The project would implement ongoing waste reduction measures to ensure that the waste is minimized and the operation of the project complies with City ordinances.

3.3.8 Environmental Design Considerations

The project would implement the following sustainable project design features. These project design features have been noted on project plans and/or the Climate Action Plan checklist and would be implemented as a part of the project.

- **Energy:** install 100 percent low emitting diode lights, low-e dual pane windows to minimize heat loss in winter and heat gain in summer, and would complete Home Efficiency Rating System testing.
- Transportation: provide 3 percent of the total parking spaces (eight spaces) with a listed
 cabinet, box, or enclosure connected to a conduit linking the parking spaces to electrical
 service and provide four of those spaces with an active electric vehicle charging station for
 use by residents.
- **Water**: minimize water consumption through installation of low-flow fixtures/appliances including kitchen faucets, dishwashers, and clothes washers. Units would be equipped with a demand hot water recirculation system per A4.303.5 of the California Green Building Standards Code.
- **Landscape**: low and moderate water use plant species would be installed. Smart irrigation controllers would be installed and plants would be grouped by water needs (hydrozones) as detailed in planting and irrigation plans. No invasive plant species would be used.
- Recycling: provide litter bins with recycling as a feature in all common areas to reduce the
 amount of waste disposed. The project would comply with the City's Recycling Ordinance
 and Refuse and Recyclable Material Storage Regulations and would achieve a 40 percent
 diversion rate during project operation. The project would achieve a 96 percent diversion
 rate for construction and demolition waste.

3.4 Discretionary Actions

Discretionary actions are those actions taken by an agency that call for the exercise of judgment in deciding whether to approve or how to carry out a project. Project implementation would require the following discretionary actions, detailed below.

3.4.1 General Plan Amendment

The project site is currently designated as Residential and Commercial Employment, Retail, & Services in the General Plan's Land Use and Street System Map (contained in the Land Use Element). The project requires a General Plan Amendment to amend the Land Use and Street System Map to identify the site as entirely Residential.

3.4.2 Community Plan Amendment

The project site is composed of two parcels. The Community Plan designates the northern parcel as Low Density Residential (5-10 dwelling units/acre) and General Commercial, while the southern parcel is designated Mobile Home Park and General Commercial. A Community Plan Amendment is required to amend the CMCP <u>as follows:</u>

- to rRemove the mobile home park overlay; and
- <u>aApply</u> a medium density residential (15 to 30 dwelling units per acre) designation to the project site.

In addition, the CMCP would be revised to remove reference to the need to preserve the existing Coastal Trailer Villa recreational vehicle park on the project site.

3.4.3 Rezone

A rezone is required to change the existing zoning of CC-4-2 and RS-1-7 to a residential–multiple unit (RM-2-5) zone.

3.4.4 <u>Land Development Code and Local Coastal Program</u> Amendment

The project site is currently located within a designated Mobile Home Park Overlay Zone. The project requires a Land Development Code (Chapter 13, Article 2, Division 7) and Local Coastal Program Amendment to remove the project site from the Mobile Home Park Overlay Zone.

Consistent with City Municipal Code Table 143-04A, the project requires a Planned Development Permit to allow proposed deviations from applicable zone regulations. Proposed deviations would allow for carports and trash enclosures to encroach approximately 2 feet into the northern property line setback (at the slope below Tonopah Avenue), allow the clubhouse building to encroach into the front yard setback along Morena Boulevard, allow Building #6 to encroach into the side yard setback along Morena Boulevard, allow deviations from the retaining wall height regulations, and allow for a deviation to the 7-foot horizontal dimension requirement for outside assigned unit storage to account for proposed tenant storage within the building envelope.

3.4.65 Site Development Permit

Due to the presence of Environmentally Sensitive Lands, the project requires a Site Development Permit. Specifically, the project site is located within a special flood hazard area (100- and 500-year floodplain), which qualifies as Environmentally Sensitive Lands pursuant to City Municipal Code Section 143.0110.

3.4.<u>7</u>6 Vesting Tentative Map

A Vesting Tentative Map would be required to create a 150-unit condominium map. Individual units would be offered for rent, not for individual sale.

3.5 Federal/State Consultation

3.5.1 FEMA Letter of Map Revision - Fill

A Conditional Letter of Map Revision based on fill has been prepared and submitted to the Federal Emergency Management Agency (FEMA) in order to certify that the proposed development would raise the site out of the 100-year floodplain. A Letter of Map Revision based on Fill will be processed with FEMA after mass grading is complete to document the as-built condition after construction of the project.

3.5.2 Federal Aviation Administration Part 77 Determination

The project site lies within the Federal Aviation Administration (FAA) Noticing Area for the San Diego International Airport. The project will be submitted to the FAA for their review of obstruction evaluation criteria contained in the Federal Code of Regulations, Title 14, FAA Part 77 (Obstruction Evaluation/Airport Airspace Analysis) at least 45 days prior to construction.

3.5.3 Native American Heritage Commission

The City completed consultation with the Native American tribes consistent with the requirements of Assembly Bill 52 and Senate Bill 18. Tribes who are traditionally and culturally affiliated with the geographic area of the project were invited to consult regarding potential impacts to tribal cultural resources. The City received responses from the lipay Nation of Santa Ysabel and the Jamul Indian Village of Kumeyaay Nation requesting consultation on the project. During tribal consultation, neither tribe identified any known tribal cultural resources on the project site, but requested that Native American monitors be present during ground disturbance activities.

3.6 History of Project Changes

The project was initially planned to be developed after adoption of proposed land use changes associated with the Morena Corridor Specific Plan and/or the CMCP. However, due to timing of these planning efforts, the project was submitted to the City as an individual development project in 2016, requesting an amendment to the CMCP to achieve higher residential densities in advance of the comprehensive community plan update.

The project applicant has conducted a number of outreach efforts with the community to obtain feedback on the project design to achieve a project that would meet the policy goals of the City while

providing a project that would be compatible with the existing community character. Initially, the project identified the pool and clubhouse area internal to the residential buildings; however, the community wanted to see the buildings set back further from Morena Boulevard to soften the visual appearance of the structures as viewed from the surrounding roadways. The project was redesigned to place the recreational features of the project adjacent to Morena Boulevard to minimize the visual massing of structures and provide additional setback of structures from the street.

Additionally, during project processing, City staff identified that the 8-inch sewer lines along the Morena Boulevard and West Morena Boulevard frontages was located under the sidewalk/curb area. As the preferred location for a sewer line is in the street with a 5-foot buffer between the curb and the sewer; the project applicant agreed to redesign the project frontage to move the sidewalk toward the project site to allow for the sewer line to be relocated into the street. This essentially provides a wider road right-of-way, increasing the travel way by 4 to 5 feet along the project frontage to accommodate the sewer line. This shifting of the sidewalk location toward the development area required creation of a tiered retaining wall between the sidewalk and the development area.



Chapter 4.0 Environmental Analysis

The following sections analyze the potential environmental impacts that may occur as a result of project implementation. The environmental issues subject to detailed analysis in the following sections include those that were identified by the City of San Diego (City) through preliminary project review and in response to the Notice of Preparation as potentially significant.

In accordance with the City's 2005 EIR Guidelines, the issue of land use is addressed first and followed by the remaining issues in order of descending significance. However, for some issues, relative significance of impacts is roughly equal; thus, the ordering of issues contained in Chapter 4.0 comprises an approximate and subjective prioritization of impact significance. The 15 environmental issues addressed in Chapter 4.0, in sequential order, include:

- Land Use
- Noise
- Paleontological Resources
- Cultural Resources
- Tribal Cultural Resources
- Traffic Circulation
- Visual Effects and Neighborhood Character
- Health and Safety/Hazardous Materials
- Hydrology
- Water Quality
- Geology and Soils
- Public Services
- Utilities
- Air Quality
- Greenhouse Gas Emissions

Each issue analysis section is formatted to include a summary of existing conditions, the criteria for the determination of impact significance, evaluation of potential project impacts, a list of required mitigation measures if applicable, and conclusion of significance after mitigation for impacts identified as requiring mitigation.

All potential direct and indirect impacts in Chapter 4.0 are evaluated in relation to applicable City, state, and federal standards, as reflected in the City's Significance Determination Thresholds (July 2016a), and include City goals and standards for each environmental issue that are largely in compliance with the City General Plan. Where the General Plan includes updated standards, those are additionally considered in the impact evaluation in Chapter 4.0.

4.1 Land Use

This section discusses the project's consistency with applicable local plans and regulations. This section analyzes whether the change of land use could have indirect or secondary environmental impacts. Consistency with applicable noise standards of the General Plan is evaluated and analysis is based on the noise technical report titled Assessment of Environmental Noise prepared by Veneklasen Associates, Inc. (Appendix B). The compatibility of the project with surrounding land uses and community character is addressed in Section 4.7, Visual Effects and Neighborhood Character.

4.1.1 Existing Conditions

The project site is currently developed with the Coastal Trailer Villa Recreational Vehicle (RV) park. The RV park is comprised of existing offices, laundry and storage facilities, internal roads and driveways, and 90 RV spaces. The project site is a highly built environment surrounded by a mixture of commercial and residential development and adjacent to major transit corridors including the Interstate 5 and heavy rail system. Land uses immediately surrounding the project site include single-family residential land uses to the east and south, a convenience store directly across Frankfort Street to the south, and a gas station just south of the project site at the West Morena Boulevard and Morena Boulevard intersection. Immediately north of the project site, along Morena Boulevard, is a mixture of commercial uses including an automotive repair shop and a bar/music venue. For additional discussion of existing land use, refer to Section 2.3.1.

4.1.2 Regulatory Framework/Applicable Plans and Policies

4.1.2.1 City of San Diego General Plan

State law requires each city to adopt a general plan to guide its future development, and mandates that the plan be periodically updated to ensure its continuing relevance and value (State Planning and Zoning Law, California Government Code, Section 65300). State law also requires the inclusion of seven mandatory elements into the General Plan (land use, circulation, housing, conservation, noise, open space, and safety), but permits flexibility and the inclusion of optional elements to best meet the needs of a particular city.

The City of San Diego (City) General Plan sets forth a comprehensive, long-term plan for development within the City. A comprehensive update of the City's General Plan was adopted March 10, 2008, and was based on a new planning strategy for the City developed in the 2002 Strategic Framework Element. Known as the City of Villages strategy, the General Plan aims to redirect development away from undeveloped lands and toward already urbanized areas and/or areas with conditions allowing the integration of housing, employment, civic, and transit uses. This

development strategy mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development within areas with available public infrastructure.

The Strategic Framework comprises the introductory chapter of the new General Plan, followed by 10 elements:

- Land Use and Community Planning
- Mobility
- Urban Design
- Economic Prosperity
- Public Facilities, Services, and Safety
- Historic Preservation
- Recreation
- Conservation
- Noise
- Housing

The Land Use and Community Planning Element (Land Use Element) provides policies to implement the City of Villages strategy within the context of the City's community planning program. The element addresses land use issues that apply to the City as a whole and identifies the community planning program as the mechanism to designate land uses, identify site-specific recommendations, and refine citywide policies as needed. The Land Use Element establishes a structure for the diversity of each community and includes policy direction to govern the preparation of community plans. The element addresses zoning and policy consistency, the plan amendment process, airport-land use planning, balanced communities, equitable development, and environmental justice.

The General Plan Land Use and Street System Map (contained in the Land Use Element) identifies the project site as Residential and Commercial Employment, Retail, & Services (Figure 4.1-1). In addition, the General Plan Land Use Element identifies the project site as having a medium propensity for village development (Figure 4.1-2). Factors considered in locating village sites and ranking village propensity include community plan-identified capacity for growth; existing public facilities or an identified funding source for facilities; and an existing or identified funding source for transit service, community character, and environmental constraints. Village propensity also takes into consideration the location of parks, fire stations, and transit routes. By overlaying the facilities factors with the land uses, the Village Propensity Map of the General Plan illustrates existing areas that already exhibit village characteristics, and areas that may have a propensity to develop as village areas.

The **Mobility Element** contains policies that promote a balanced, multi-modal transportation network while minimizing environmental and neighborhood impacts. In addition to addressing walking, streets, and transit, the element also includes policies related to regional collaboration, bicycling, parking, the movement of goods, and other components of the transportation system.

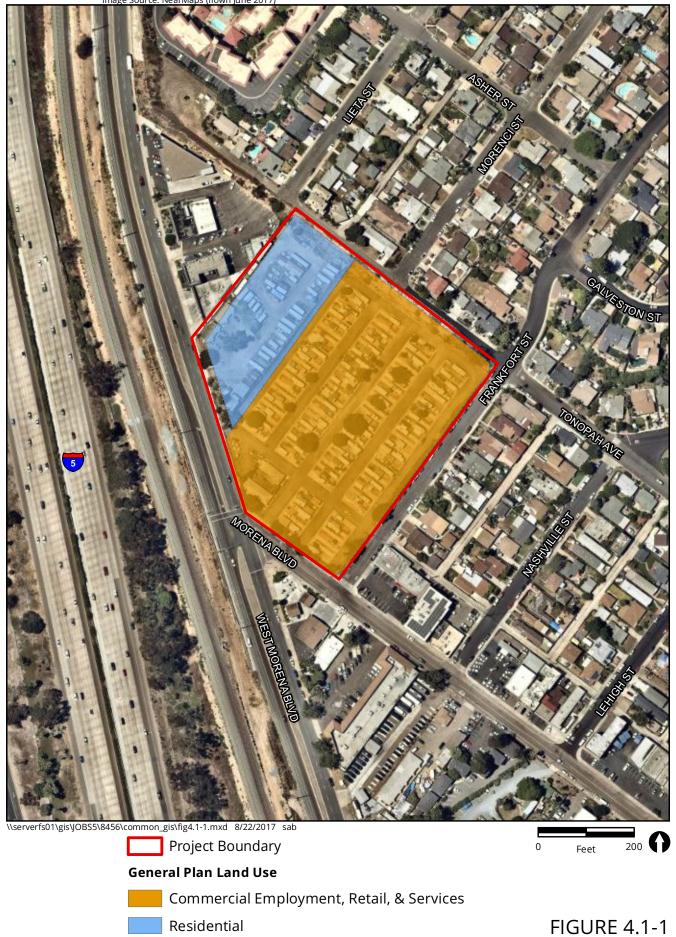
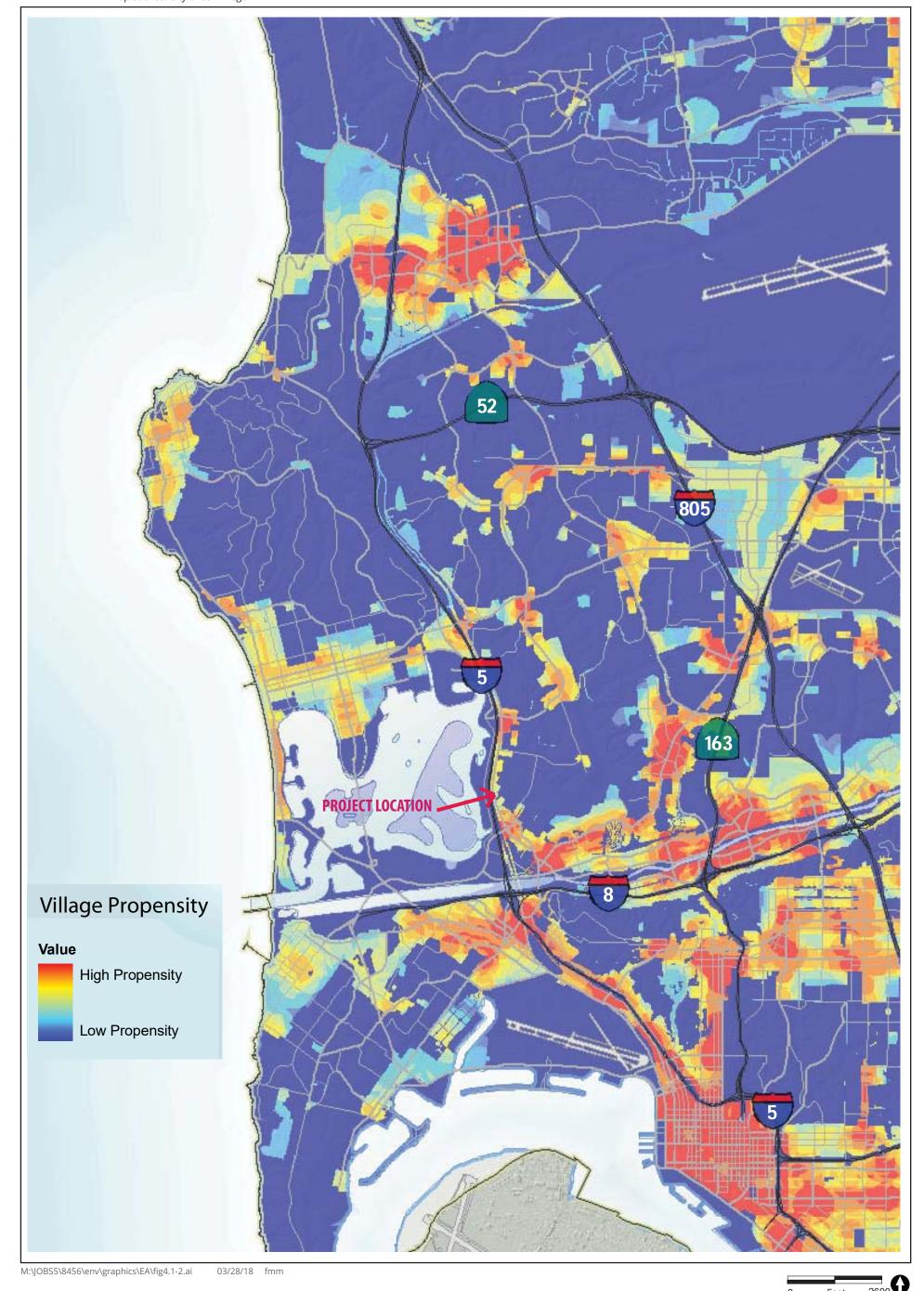


FIGURE 4.1-1
General Plan Land Use



Urban Design Element policies call for development that respects the City's natural setting; enhances the distinctiveness of neighborhoods; strengthens the natural and built linkages; and creates mixed-use, walkable villages throughout the City. The Urban Design Element addresses urban form and design through policies relative to the City's natural environment that work to preserve open space systems and target new growth into compact villages.

The **Economic Prosperity Element** identifies policies intended to improve economic prosperity by ensuring that the economy grows in ways that strengthen industries, retains and creates good jobs with self-sufficient wages, increases average income, and stimulates economic investment in communities.

The **Public Facilities**, **Services**, **and Safety Element** is directed at providing adequate public facilities through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. The policies within the Public Facilities Element also apply to transportation and park and recreation facilities and services.

The **Conservation Element** contains policies to guide the conservation of resources that are fundamental components of the City's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. The City's resources include, but are not limited to water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy.

The **Historic Preservation Element** guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources.

The **Noise Element** provides goals and policies to guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment (see Section 4.1.2.2 below).

The separately adopted 2013-2020 **Housing Element** is intended to assist with the provision of adequate housing to serve San Diegans of every economic level and demographic group. The updated housing element was adopted in March 2013.

Relevant sections/policies of the General Plan and the applicability of each to the proposed project are detailed in Table 4.1-1.

4.1.2.2 Noise Element - Noise/Land Use Compatibility Standards

The Noise Element of the City of San Diego General Plan establishes noise/land use compatibility criteria. For Residential multi-family uses, exterior noise levels up to 60 community noise equivalent level (CNEL) is considered compatible. Although not generally considered compatible, the City conditionally allows exterior noise levels associated with multiple unit and mixed-use residential uses up to 75 A-weighted decibels [dB(A)] CNEL in areas affected primarily by motor vehicle traffic noise with existing residential uses. Any future residential use above the 70 dB(A) CNEL must include noise attenuation measures and must ensure interior noise levels of 45 dB(A) CNEL, and be located in an area where a community plan allows multiple unit and mixed-use residential uses. According

to Table NE-3 of the Noise Element, the acceptable exterior noise limit at outdoor use areas is 60 CNEL. Noise levels above 70 CNEL are incompatible and new construction should not be undertaken. At outdoor use areas, feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable.

4.1.2.3 Clairemont Mesa Community Plan

Community plans provide the level of information that is needed to review and assess proposed public and private development projects. However, community plans are policy documents that do not contain regulatory requirements. Regulatory requirements are contained in the Land Development Code (LDC), as explained below. Originally approved in 1989, the Clairemont Mesa Community Plan (CMCP) was most recently revised in April 2011 and the City is currently in the process of completing a comprehensive update to the Community Plan. The CMCP includes goals and objectives established by residents, property owners, and business owners to guide development within the community. The CMCP contains the following eight elements; those elements relative to the project are briefly described below.

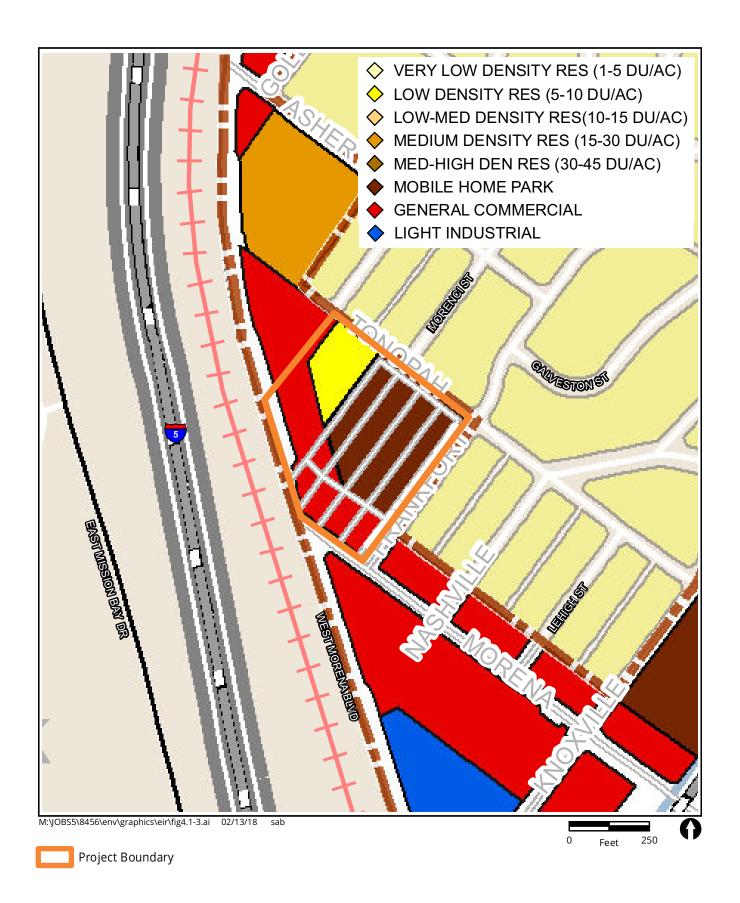
- Urban Design
- Residential
- Commercial
- Industrial

- Transportation
- Open Space and Environmental Resources
- Population-Based Parks and Recreation
- Community Facilities

The planned land uses on the project site according to the CMCP are shown on Figure 4.1-3. As shown, the project site is located within an area designated as Multi-Family Residential and Mixed-Use.

The **Urban Design Element** describes Clairemont Mesa as "an attractive place to live, work, and play" and key community attributes, including but not limited to, the visual aesthetics of nearby canyons, low-density residential development adjacent to canyons and parks, and well established single-family neighborhoods on the mesa with views of Mission Bay, the Pacific Ocean, the mountains to the east, and the canyons. Although this element does not include specific goals and objectives, the CMCP has incorporated recommendations throughout other elements to achieve the Urban Design Element's goal to preserve Clairemont Mesa's identity for future generations.

The **Residential Element** seeks to maintain Claremont Mesa's low-density character of predominately single-family neighborhoods and encourage rehabilitation where appropriate. This element presents objectives to guide future residential development within Clairemont Mesa in a manner that would provide a diversity of housing options, ensure that future development is compatible with the existing neighborhood and does not overburden existing community or neighborhood facilities, and locate higher density housing near the commercial areas along transportation corridors. This element also contains objectives to preserve the existing mobile homes on Morena Boulevard, and the project site is subject to the CMCP Mobile Home Park Overlay Zone. This element also seeks to provide adequate off-street parking.



The **Transportation Element** seeks to provide a safe and efficient transportation system that maximizes access to community activity centers and to destinations within the City while minimizing adverse environmental effects. This element contains objectives to improve the street system to accommodate future growth while minimizing adverse effects, develop a bicycle system, provide an efficient and high level of public transit, enhance pedestrian circulation, enhance the community's image through streetscape improvements, and minimize adverse noise impacts.

The **Open Space and Environmental Resources Element** seeks to provide an open space system that preserves existing canyon and hillsides and dedicate open space areas as infill development occurs within the community. Relevant objectives within this element include to reduce runoff and the alteration of the natural drainage system and to protect the resource value of artifacts and paleontological remains and the community's heritage for future generations.

The **Population-Based Parks and Recreation Element** seeks to provide a system of parks and recreation facilities to meet the recreational needs of the entire community in conformance with Progress Guide and General Plan standards. The relevant objective within this element is to increase recreational opportunities in new residential and commercial development.

The **Community Facilities Element** seeks to establish and maintain high level of public facilities and services to meet the needs of the community. Relevant objectives in this element include providing educational services, police and fire protection, and public utilities in accordance with City standards and maintaining water and sewer facilities to adequately serve the community.

4.1.2.4 Draft Morena Corridor Specific Plan/Morena Boulevard Station Area Planning Study

The project site is located within the boundaries of the Draft Morena Corridor Specific Plan, which is currently being developed to enhance the Morena Corridor's mobility framework. The Specific Plan intends to develop a vibrant community core, placing transportation nodes at locations that support higher residential density, both existing and planned. The policies and recommendations in the Draft Morena Corridor Specific Plan were developed based on the Morena Boulevard Station Area Planning Study (MBAP), which addresses the future form of the Morena Boulevard corridor resulting from urban development and implementation of the Mid-Coast Light Rail Transit Project Trolley Blue Line extension. The Draft Morena Corridor Specific Plan was released for public comment in June of 2017.

4.1.2.5 San Diego International Airport – Airport Land Use Compatibility Plan

The San Diego International Airport (SDIA) Airport Land Use Compatibility Plan (ALUCP), prepared by the San Diego County Regional Airport Authority (SDCRAA), provides airport land use compatibility policies and criteria for the City to implement with its land use plans and zoning (SDCRAA 2014). Any proposed land use plan amendments or rezones within the Airport Influence Area (AIA) are required by state law to be submitted to the Airport Land Use Commission for a consistency determination with the ALUCP. The purpose of an ALUCP is to provide for the orderly growth of airports and the

areas surrounding the airports, and to safeguard the general welfare of inhabitants within an airport's vicinity. An ALUCP addresses compatibility between airport operations and future land uses that surround them by providing policies and criteria for aircraft overflight, noise, safety, and airspace protection, to both minimize the public's exposure to excessive noise and safety hazards within the AIA and to preserve the viability of airport operations. The AIA Review Area 1 is generally composed of aircraft overflight area, noise contour (60 CNEL and greater), accident potential, and Federal Aviation Administration [FAA] Part 77 airspace protection surfaces. The AIA Review Area 2 is generally composed of aircraft overflight area and the FAA Part 77 airspace protection surfaces.

The SDIA runways are approximately 2.6 miles south of the project site. The project is located within the AIA Review Area 2 of the SDIA ALUCP. Per the SDIA ALUCP, only airspace protection and overflight policies and standards apply within AIA Review Area 2. The SDIA ALUCP also states that future land uses within AIA Review Area 2 would only require Airport Land Use Compatibility review if it:

- Would Increase height limits.
- Has received from the FAA a Notice of Presumed Hazard, a Determination of Hazard or a Determination of No Hazard subject to conditions, limitations or marking and lighting requirements.
- Would create hazards related to:
 - o Glare
 - Lighting
 - o Electromagnetic interference
 - o Dust, water vapor, and smoke
 - o Thermal plumes
 - Bird attractants

4.1.2.6 Land Development Code Regulations

Chapters 11 through 15 of the City's Municipal Code are referred to as the LDC, as they contain the City's planning, zoning, subdivision, and building regulations that dictate how land is to be developed within the city. The LDC contains citywide base zones that specify permitted land use, density, floorarea ratio, and other development requirements for given zoning classifications; as well as overlay zones and supplemental regulations that provide additional development requirements.

Development of the project site would be subject to the requirements of the RM-2-5 base zone, as well as the many general development regulations pertaining to landscaping, lighting, grading, parking, signage, etc.

Chapters 13 (Zones) and 14 (General Regulations) are of particular relevance to development of the project. Chapter 13, Zones, includes the applicable development regulations for the base zones of the project site.

Chapter 14 of the LDC includes the general development regulations, supplemental development regulations, subdivision regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of project development. The grading, landscaping, parking,

signage, fencing, and storage requirements are all contained within the Chapter 14 general regulations. Also included within the general regulations of Chapter 14 are the Environmentally Sensitive Lands (ESL) Regulations, discussed below. All other applicable land development regulations are discussed throughout this EIR, particularly in Chapters 3.0 (Project Description) and 4.0 (Environmental Analysis).

a. Base Zones

The LDC Chapter 13, Zones, includes use and development regulations pertinent to the base zone classifications for the project site. As shown in Figure 4.1-4, the majority of the project site is designated as RS-1-7, which allows single-dwelling units with minimum 5,000-square-foot lots (San Diego Municipal Code [SDMC] Section 131.0403(b)(1)). The southern and southwestern portion of the project site is designated as CC-4-2, which allows community commercial development intended to accommodate development with high intensity, strip commercial characteristics and permits a maximum density of 1 dwelling unit for each 1,500 square feet of lot area (SDMC Section 131.0507(b)(4)).

b. Environmentally Sensitive Lands Regulations

The ESL Regulations were adopted by ordinance as a part of the LDC (Municipal Code). The purpose of the ESL regulations is to protect and preserve ESL and the viability of the species supported by those lands. The regulations are intended to ensure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area (Municipal Code, Chapter 14, Article 3: Supplemental Regulations, Division 1: ESL Regulations, Section 143.0101 et seq.). The project site is subject to the ESL Regulations because the southern portion of the property is located within the 100-year floodplain associated with Tecolote Creek. As described in Section 3.4.5 of this EIR, the project includes a Site Development Permit for development affecting ESL.

4.1.2.7 Multiple Species Conservation Program Subarea Plan

The Multiple Species Conservation Program (MSCP) is a comprehensive program to preserve a network of habitat and open space in the region. Large blocks of native habitat having the ability to support a diversity of plant and animal life are designated as multi-habitat planning areas (MHPAs). MHPA lands are those that have been included within the City's MSCP Subarea Plan for habitat conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. MHPA lands are considered by the City to be a sensitive biological resource. The City's MSCP Subarea Plan provides Land Use Adjacency Guidelines (Guidelines) to avoid or reduce significant indirect impacts to MHPAs from adjacent land uses. The Guidelines include drainage, lighting, noise, and slope grading recommendations for adjacent development, as well as recommendations for avoiding or redirecting toxic chemicals (e.g., from landscape or agricultural fertilization) and prohibition of the planting of invasive species. New development adjacent to the MHPA may also be required to provide barriers along the MHPA boundary to direct public access to appropriate locations and reduce domestic animal predation. The project site is not located within or adjacent to a designated MHPA area (City of San Diego 1997).



Project Base Zones

4.1.2.8 San Diego Forward: The Regional Plan

The San Diego Association of Governments (SANDAG) is the regional authority that creates regional-specific documents to provide guidance to local agencies, as SANDAG does not have land use authority. SANDAG's San Diego Forward: The Regional Plan (Regional Plan) was adopted by the SANDAG Board of Directors on October 9, 2015 (SANDAG 2015). The Regional Plan combines two of the region's existing planning documents: the Regional Comprehensive Plan (RCP) for the San Diego Region and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RCP, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas, including urban form, transportation, housing, health environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the Regional Plan.

The project site is located within an Existing/Planned Mixed-Use Transit Corridor (SD CM-7), a Smart Growth Opportunity Area identified on the SANDAG Smart Growth Concept Map (SANDAG 2016a). Mixed-Use Transit Corridors are characterized as having high-frequency local bus or streetcar/shuttle service. SANDAG identifies this area as a Mixed-Use Transit Corridor place type due to the existing high-frequency local bus service (Route 50), the planned trolley (Route 510 – planned Mid Coast Trolley Extension), and the planned high frequency local bus service (Route 105) that is planned to be phased in by 2020. SANDAG identifies a target minimum density of 25 dwelling units per acre for this opportunity area.

4.1.3 Significance Determination Thresholds

The following thresholds have been established by the City to determine significance under California Environmental Quality Act (CEQA) related to Land Use.

A significant impact to land use could occur if there is a/an:

- 1. Inconsistency/conflict with the environmental goals, objectives, or guidelines or a Community Plan or General Plan;
- 2. Inconsistency/conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts occur;
- Substantial incompatibility with an adopted plan;
- Incompatible uses as defined in an airport land use plan or inconsistency with an Airport Land Use Compatibility Plan (ALUCP) as adopted by the Airport Land Use Commission (ALUC);
- 5. Inconsistency/conflict with adopted environmental plans for an area; and/or
- 6. Significant increase in the base flood elevation for upstream properties, or construction in a Special Flood Hazard Area or floodplain/wetland buffer zone.

As stated in the City's Thresholds, project inconsistency or conflict with a plan does not in and of itself constitute a significant environmental impact. The plan or policy inconsistency would have to result in a physical effect on the environment to be considered significant pursuant to the City's guidelines and CEQA.

4.1.4 Issue 1: General and Community Plan Consistency

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

4.1.4.1 Impacts

The analysis of impacts under issue question 1 addresses Significance Determination Thresholds 1 and 2 as detailed in Section 4.1.3, above. The project site is currently designated as Residential and Commercial Employment, Retail, & Services in the General Plan Land Use Element, Land Use and Street System Map, and as General Commercial, Low Density Residential, and Mobile Home Park in the Community Plan Land Use Map. Additionally, the project site is subject to the Mobile Home Park Overlay Zone within the CMCP. As detailed in Section 3.4 the project would require a General Plan Amendment (GPA) and a Community Plan Amendment (CPA) to change the land use designation to Medium Density Residential (15 to 30 dwelling units per acre) and remove the CMCP Mobile Home Park Overlay. The project would also require a rezone to change the existing zoning designations for the project site from RS-1-7 and CC-4-2 to Residential--Multiple Unit (RM-2-5), which would allow for development of multiple dwelling units at a maximum density of one dwelling unit per 1,500 square feet of lot area. While the project requires a GPA, CPA, and Rezone to allow for development of 150 apartment homes, the proposed land use changes would not conflict with environmental goals, objectives or recommendations of the General Plan or CMCP, as discussed further below.

The General Plan provides goals and policies that guide the development of Community Plans, as well as growth and development citywide. Most of the General Plan's goals are implemented through policy established in the CMCP; however, there are also some General Plan policies that relate directly to the project. General Plan Elements and issues that relate specifically to the project include Land Use; Mobility; Urban Design; Public Facilities, Services, and Safety; Historic Preservation; Recreation; and Noise.

The CMCP also provides goals and objectives specific to the CMCP area. CMCP Elements and issues that relate specifically to the project include Residential; Transportation; Open Space and Environmental Resources; Population-Based Parks and Recreation; and Community Facilities.

Table 4.1-1 (located at the end of this section) provides a summary analysis of the project's consistency with the relevant goals and policies of the CMCP and the General Plan. Table 4.1-1 also evaluates project consistency with all applicable land use plan goals and objectives.

As demonstrated in Table 4.1-1, the project would be consistent with all relevant General Plan and CMCP goals, objectives, and policies. The project would also be consistent with the General Plan City of Villages strategy described in 4.1.2.1. Consistent with the City of Villages strategy, the project would provide for higher density development within existing urbanized areas with access to transit

uses. The project site is identified in the General Plan Land Use Element as having a medium propensity for village development (see Figure 4.1-2). The intensification of residential uses at the project site would be consistent with this anticipated village development, and no conflict with an adopted land use designation or intensity would occur.

The project would also be consistent with future planning efforts as outlined in the Regional Plan as it would provide for a density of approximately 26 units per acre, which is greater than SANDAG's target minimum density of 25 dwelling units per acre. Additionally, the project would provide transit supportive residential densities that would support the existing and planned transit including the proposed Tecolote Trolley/LRT station proposed under the Mid-Coast Corridor Transit Project Trolley Blue Line Extension.

4.1.4.2 Significance of Impacts

Implementation of the project would not result in inconsistencies with environmental goals, objectives or guidelines, with the General Plan or community plan, or conflict with an adopted land use designation or intensity as stated by the Significance Determination Thresholds 1 and 2. Overall, the project would be consistent the General Plan and CMCP goals, policies, and objectives. Impacts would be less than significant.

4.1.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.1.5 Issue 2: LDC Compliance

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

4.1.5.1 Impacts

The analysis of impacts under issue question 2 addresses Significance Determination Thresholds 2 and 6 as detailed in Section 4.1.3, above. The following discussion evaluates the project's consistency with applicable development regulations of the LDC. Because the project is requesting deviations from selected development regulations, this analysis is provided to evaluate whether the proposed deviations would result in environmental impacts.

a. Environmentally Sensitive Land Regulations

The southern portion of the project site is located within Federal Emergency Management Agency (FEMA) Zone AO, which is designated as being within the 100-year floodplain. Consequently, the southern portion of the project site is considered a Special Flood Hazard Area under the ESL Regulations of the SDMC. Per SDMC Section 143.0145, development of multi-family units within a Special Flood Hazard Area would be prohibited. However, construction of the project would include a net import of approximately 1,000 cubic yards in order to increase elevations and raise all portions

of the project site on which housing would be constructed out of the 100-year floodplain. Project design and construction methods to increase elevations at the project are being reviewed by FEMA and ultimately a Letter of Map Revision/Conditional Letter of Map Revisions Based on Fill (LOMR/CLOMR-F) will be required documenting that the project would be constructed on elevations outside of the 100-year floodplain. By raising elevations of all portions of the project site on which housing would be constructed out of the 100-year floodplain, the project would ensure that all required permit findings associated with sites containing ESL would be met.

The import of approximately 1,000 cubic yards of fill has been included as a project component used in the impact analysis throughout this EIR. The project's design would increase elevations of those portions of the project site within the floodplain to effectively eliminate a Special Flood Hazard Area condition from the project site. Refer also to Section 4.9 (Hydrology) for additional discussion of drainage and on-site flood conditions, demonstrating that impacts related to flood hazards would be less than significant. With the proposed raising of the site elevation out of the floodplain, all findings and supplemental findings could be met, and there would be no adverse impact associated with development within a Special Flood Hazard Area.

b. Deviation from Retaining Wall Heights and Setback Regulations

The project would require deviations to the allowable retaining wall heights and setback regulations. The physical impacts associated with the retaining walls and carports have been included as a part of the project footprint used for the impact analysis throughout this EIR. Specifically, the project design requires an 18-foot split face block retaining wall at the northeastern property line at the bottom of the slope below Tonopah Avenue to support the existing slope. The potential visual impacts of the retaining wall are evaluated in Section 4.7 (Visual Effects and Neighborhood Character), which concludes visual impacts of the retaining wall would be less than significant due to lack of visibility of the wall from the surrounding area in addition to proposed vegetative screening that would be installed to soften and break up the visual impact of the wall. Refer to Figure 3-5 for a depiction of the proposed wall with landscaping. Figure 3-7 depicts a cross section of this wall at scale with the proposed buildings.

The deviation to allow trash enclosures and carports to encroach into the setbacks would not have an adverse environmental effect. The encroachment into the setback would occur at the bottom of the slope at the north end of the site below Tonopah Avenue. Due to the elevation change and steep slope separating Tonopah Avenue from the location of the carports and trash enclosures, their minimal setback encroachment would not adversely affect any adjacent properties or result in a visual impact because these structures would not be visible from the adjacent single-family residential properties. Thus, deviations from the setback regulations would not result in an adverse environmental impact.

c. Deviation to the 7-foot Horizontal Dimension Requirement for Outside Assigned Unit Storage

A deviation is requested to the requirement for a 7 foot 0 inches minimum dimension for private tenant storage areas outside the dwelling units. The project design locates the required storage

areas within the building envelope consistent with the minimum dimension. No environmental impact would result from approval of this deviation.

4.1.5.2 Significance of Impacts

None of the proposed deviations would conflict with an adopted land use designation or intensity of use (Significance Determination Threshold 1). Additionally, the project would not have an adverse impact associated with development within a Special Flood Hazard Area (Significance Determination Threshold 6). Impacts associated with the proposed deviations would be less than significant.

4.1.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.1.6 Issue 3: MSCP Consistency

Would the project conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan?

4.1.6.1 Impacts

The analysis of impacts under issue question 3 addresses Significance Determination Thresholds 3 and 5 as detailed in Section 4.1.3, above. MHPA lands are those that have been included within the City's MSCP Subarea Plan for habitat preservation in order to maximize conservation of sensitive biological resources, including sensitive species. The project site does not contain MHPA lands, nor is it directly adjacent to any MHPA lands. Furthermore, the site is entirely developed and no other local, regional, or state conservation plan has identified the project site for preservation. Therefore, the project would not conflict with the City's MSCP Subarea Plan or any other approved local, regional, or state habitat conservation plans.

4.1.6.2 Significance of Impacts

Implementation of the project would not conflict with the City's MSCP Subarea Plan (Significance Determination Threshold 3) or be incompatible with any other approved local, regional, or state habitat conservation plan (Significance Determination Threshold 5). Impacts would be less than significant.

4.1.6.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.1.7 Issue 4: Physically Divide an Established Community

Would the project physically divide an established community?

4.1.7.1 Impacts

The project consists of infill redevelopment for the construction of 150 market-rate multi-family units on two parcels surrounded by residential, commercial, and retail uses, and in proximity to Interstate 5 and the Los Angeles-San Diego-San Luis Obispo rail corridor. The project would be constructed entirely on an existing developed site with existing access from major roadways. The project would not require construction of any new roads and would not close or block access roads that could divide the surrounding community. No significant extension of public utilities would be required, as existing pipelines for water and wastewater are located on the project site. Therefore, the project would not physically divide an established community.

4.1.7.2 Significance of Impacts

The project does not include any features that would have the potential to physically divide an established community. No impact would occur.

4.1.7.3 Mitigation, Monitoring, and Reporting

No impact would occur. No mitigation is required.

4.1.8 Issue 5: Compatibility with Airport CLUP

Would the project result in land uses which are not compatible with an adopted airport CLUP?

4.1.8.1 Impacts

The analysis of impacts under issue question 5 addresses Significant Determination Threshold 4 as detailed in Section 4.1.3, above. The project site is located within Review Area 2 of the SDIA ALUCP, which does not require a consistency determination from the SDCRAA provided the applicant provides a FAA No Hazard letter or self-certification agreement. Prior to issuance of a building permit, the applicant would prepare and submit Form FAA 7460-1 - Notice of Proposed Construction or Alteration to obtain a determination from the FAA of No Hazard. Additionally, the project site is not located in a Safety Zone depicted in the SDIA ALUCP and proposed uses are consistent with the requirements for SDIA ALUCP AIA Review Area 2. The project is limited to infill redevelopment for the construction of 150 market-rate multi-family units and would not exceed the existing height limit of 30 feet. The project would conform to all applicable City standards regarding light and glare and would not include any uses that would generate electromagnetic fields, dust, water vapor, smoke, or thermal plumes; nor would the project attract birds. Furthermore, the project site is not located

within the SDIA ALUCP 60 dB CNEL contour, and as such is not subject to the SDIA ALUCP noise compatibility standards.

4.1.8.2 Significance of Impacts

Implementation of the project would not result in incompatible uses as defined in an airport land use plan or be inconsistent with an ALUCP as stated in Significance Determination Threshold 4. The project would be compatible with the SDIA ALUCP. Impacts would be less than significant.

4.1.8.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.1.9 Issue 6: Noise Standards

Would the proposal result in the exposure of sensitive receptors to current or future noise levels that would exceed standards established in the Noise Element of the General Plan or an adopted Airport Land Use Compatibility Plan (ALUCP)?

4.1.9.1 Impacts

The analysis of impacts under issue question 6 addresses Significance Determination Thresholds 1 and 4 as detailed in Section 4.1.3, above.

a. Noise Element

The City's Noise Element of the General Plan specifies compatibility standards for different land use categories. The noise/land use compatibility guidelines are intended to be used for future development within San Diego to prevent future incompatibilities. For multi-family residential uses, exterior noise levels up to 60 CNEL are considered "compatible" and exterior noise levels up to 70 CNEL are considered "conditionally compatible," provided noise mitigation is incorporated to make outdoor activities acceptable. Although not generally considered compatible, the City conditionally allows multiple unit and mixed-use residential uses up to 75 CNEL in areas affected primarily by motor vehicle traffic noise, provided noise mitigation techniques are incorporated into the project design.

The City's interior noise level standard for residential uses is 45 CNEL. Interior noise levels for habitable rooms are regulated also by Title 24 of the California Code of Regulations California Noise Insulation Standards. Title 24, Chapter 12, Section 1207.4, of the California Building Code requires that interior noise levels attributable to exterior sources not exceed 45 CNEL in any habitable room within a residential structure. Part 11 of Title 24 (California Green Building Standards Code [CALGreen]) also provides mandatory measures for residential and non-residential buildings. Section 5.507, Environmental Comfort, addresses interior noise control in non-residential buildings. Non-residential buildings shall be constructed to provide an interior noise environment attributable

to exterior sources that does not exceed an hourly average equivalent level of 50 dB(A) average equivalent sound level.

The noise analysis completed for the project (see Appendix B) evaluates the potential exposure of future residents to future transportation noise levels for both indoor and outdoor uses. Figure 4.1-5 shows the future noise contours on the project site. As shown, the project would result in exposure to future residences to noise levels above 70 CNEL at outdoor use areas and at the façade of residences located adjacent to Morena Boulevard.

Outdoor Use Areas

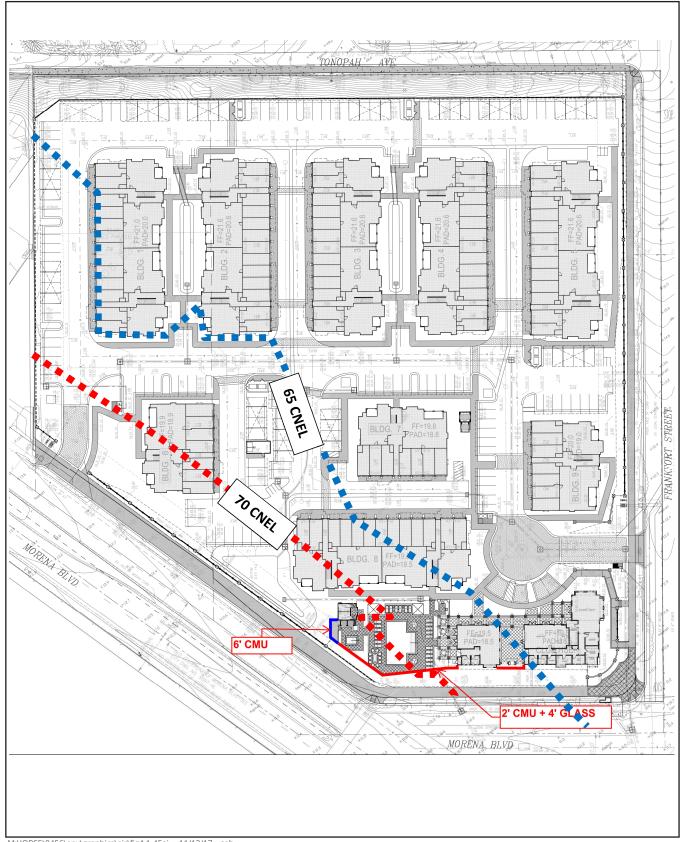
Exterior noise levels at outdoor use areas (pool/recreation area) would exceed 60 CNEL, reaching noise levels up to 74 CNEL without any noise barriers. However, the project design has incorporated a 6-foot-high sound barrier that would extend around the outdoor use areas adjacent to Morena Boulevard. With installation of this barrier, noise levels at outdoor use areas would be reduced to 72 CNEL. Although not generally considered compatible, the City conditionally allows exterior noise levels associated with multiple unit and mixed-use residential uses up to 75 CNEL in areas affected primarily by motor vehicle traffic noise, provided noise mitigation techniques are incorporated into the project design. As the project design includes a noise attenuation barrier to reduce noise levels at the outdoor use areas and the project would within the 75 CNEL limit for areas affected by vehicular noise, the project would be consistent with the Noise Element and exterior noise/land use compatibility impacts would be less than significant.

Interior Noise

The interior noise standard for residential uses is 45 CNEL. As shown in Figure 4.1-6, exterior noise levels at the façades of residences and at the proposed clubhouse building at the west side of the project site facing Morena Boulevard and the Interstate 5 freeway would experience noise levels up to 74 CNEL. Based on the anticipated noise levels at the building façades, interior noise levels would be in excess of noise compatibility standards of the General Plan resulting in a significant impact.

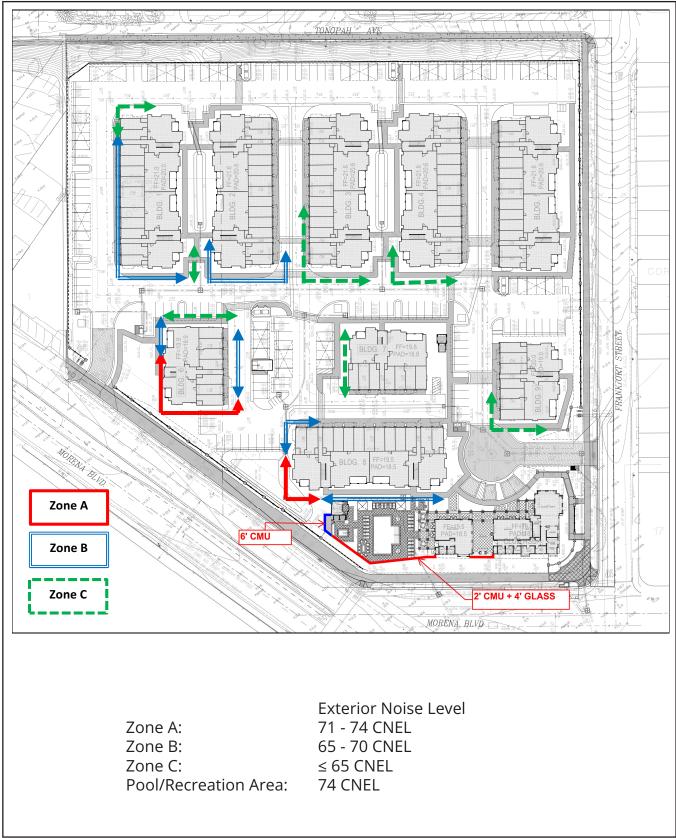
b. Airport Noise Compatibility

The project is located within the AIA Review Area 2 of the San Diego International Airport – Airport Land Use Compatibility Plan (SDIA ALUCP) (SDCRAA 2014). Per the SDIA ALUCP, only airspace protection and overflight policies and standards apply within AIA Review Area 2. Furthermore, the project site is not located within the SDIA ALUCP 60 CNEL contour, and as such is not subject to the plan's noise compatibility standards. Therefore, the project would not result in the exposure of people to current or future transportation noise levels exceed standards established in the SDIA ALUCP or result in land uses which are not compatible with aircraft noise levels as defined by the SDIA ALUCP, and impacts would be less than significant.



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FIGURE 4.1-5
Future Noise Level Contours



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4.1.9.2 Significance of Impacts

The project would expose people to interior noise levels in excess of standards established in the Noise Element of the General Plan for interior noise levels. As stated in Significance Determination Threshold 1, inconsistency with the General Plan would be a significant impact.

The project would be consistent with the Noise Element requirements for outdoor use areas with the installation of the 6-foot-high barrier around the recreation/pool area, which is included as part of the project design. Thus, impacts related to outdoor noise would not conflict with the General Plan as stated in Significance Determination Threshold 1. Impacts would be less than significant.

The project is outside of the SDIA ALUCP 60 CNEL contour and would not result in exposure of people to current or future airport noise in excess of compatibility standards (Significance Determination Threshold 5). Impacts related to airport noise compatibility would be less than significant.

4.1.9.3 Mitigation, Monitoring, and Reporting

In order to comply with Table NE-3 Land Use – Noise Compatibility Guidelines contained in the Noise Element of the General Plan and with California Code of Regulations interior noise standards, the following measures would be required to attenuate interior noise levels to 45 CNEL.

LU-1: Interior Noise

Prior to issuance of a building permit, the project applicant shall provide evidence to the City to demonstrate that buildings will achieve a 45 CNEL interior noise level. Interior noise levels of the habitable residential spaces were calculated based on typical dimensions for similar projects of this type. The project could reach acceptable interior noise levels for all three zone based on use of the following window/door ratings:

- Zone A: Utilizing sound transmission class (STC) 40 glazing would result in interior noise levels ranging from 41-45 CNEL.
- Zone B: Utilizing STC 35 glazing would result in interior noise levels ranging from 41-45 CNEL.
- Zone C: Utilizing STC 30 glazing would result in interior noise levels ranging from 40-45 CNEL.
- Remaining Façades: No requirement by code but STC 30 glazing is recommended and would result in interior noise levels ≤45 CNEL.
- STC 30 glazing would be required at the recreation building in order to meet CALGreen interior noise standards at non-residential spaces.

Table 4.1-1	
	h Applicable Land Use Plans Goals and Objectives
Objectives Company Mass Community Providence	Consistency Evaluation
CLAIREMONT MESA COMMUNITY PLAN (CMCP)	
Residential Objectives1. Provide a diversity of housing options in selected locations of the community.	Consistent: According to current San Diego Association of Governments (SANDAG) estimates, the majority of residential development within the CMCP consists of single-family detached residential (61.9 percent) (SANDAG 2016b). The project would develop 150 market-rate multi-family units which would increase residential diversity by providing residential options other than single-family detached.
Preserve the mobile home parks on Morena Boulevard to continue providing alternative means of housing.	Inconsistent. Although the existing land use on the project site is a recreational vehicle (RV) Park and not a Mobile Home Park within the meaning of municipal code sections 132.0701 et seq., and the trailers at the RV park do not meet the definition of mobile home in the Land Development Code (LDC), Section 113.0103, the two uses are similar, and the intent of this objective was to preserve both mobile home parks and RV parks. Thus, although the project would not technically reduce the number of mobile home parks in the community, it would still be considered inconsistent with this objective. However, the project includes a Community Plan Amendment (CPA) to remove the mobile park overlay and change the land use designation to Medium Density Residential. Additionally, the CPA would revise the CMCP to remove the language regarding preservation of the existing Coastal Trailer Villa mobile home park on the project site, thereby removing the inconsistency.
3. Provide development guidelines to help ensure that new development is compatible with the existing neighborhood and does not overburden community or neighborhood facilities.	Consistent: As discussed in Section 4.1, the project would be consistent with all relevant land use plans and development regulations. The project includes deviations from the City of San Diego's (City) LDC; however, as detailed in Section 4.1.5, none of the project deviations would result in an incompatibility with the existing neighborhood. As described in Sections 4.12 and 4.13, the project would not overburden community and neighborhood facilities such as fire protection, police services, schools, parks, water, and sewer.

	Table 4.1-1	
	Summary of Project Consistency with Applicable Land Use Plans Goals and Objectives	
	Objectives	Consistency Evaluation
4.	Locate higher density housing near the commercial areas and along transportation corridors where there are adequate services.	Consistent: The project proposes a CPA to change the land use designation to Medium Density Residential and remove the CMCP Mobile Home Park Overlay. Implementation of the CPA would increase density along Morena Boulevard which functions as a transportation corridor. The CPA would be consistent with the General Plan City of Villages strategy by intensifying residential uses at the project site, which is identified as having a medium propensity for village development in the General Plan Land Use Element (see Figure 4.1-2) and is located within a Smart Growth Opportunity Area identified on the SANDAG Smart Growth Concept Map (SANDAG 2016b).
5.	Provide adequate off-street parking.	Consistent. The project would provide 267 on-site vehicular parking spaces, 70 bicycle parking spaces, and 16 motorcycle parking spaces on the project site (see Table 3-3). This is consistent with City requirements and would adequately serve the project.
Tr	ansportation Objectives	Consistent: The project would improve roadway frontage as described in
1.	Improve the street system as necessary to accommodate the community's growth while minimizing adverse effects on existing residential, industrial, and commercial uses and the open space system.	Section 3.3.5, Access, Circulation, and Mobility. No open space would be impacted by the project as the site is currently developed. Additionally, as described in Section 4.6.4, Traffic Circulation, while the project would result in significant impacts to two segments of Morena Boulevard (from Frankfort Street to Knoxville Street and from Knoxville Street to Tecolote Road) under the Existing plus Project, Near-Term plus Project, and Year 2035 plus Project conditions, MM-TRA-1 would reduce all significant traffic impacts to less than significant.

		Table 4.1-1
	· · · · · · · · · · · · · · · · · · ·	Applicable Land Use Plans Goals and Objectives
	Objectives	Consistency Evaluation
2.	Develop a bicycle system that will join parks and recreational areas, schools and commercial activity centers in the community and the City.	Consistent: As described in Section 3.3.5, the MBAP identified numerous planned enhancements in the vicinity of Morena Boulevard and West Morena Boulevard, including the following:
		 Buffered Class 2 bike lanes on both sides of Morena Boulevard. A multi-use Class 1 path, with a tree-planted parkway buffer proposed on the west side of Morena Boulevard. A trail proposed along Tecolote Creek on the northern side of Tecolote Road between Morena Boulevard and West Morena Boulevard, providing pedestrian access.
		The project would provide half-width frontage improvements to Morena Boulevard along the east side (northbound direction). These improvements would not conflict with and would provide adequate right-of-way to accommodate planned bicycle facilities and improvements in the project area.
3.	Provide an efficient and high level of public transit within and surrounding the community. Design and plan land uses that will support and make use of the future light rail transit.	Consistent. The project proposes a CPA to change the land use designation to Medium Density Residential and remove the CMCP Mobile Home Park Overlay. Implementation of the CPA would be consistent with the General Plan City of Villages strategy, which intends to integrate housing, employment, civic, and transit uses. The project would intensify residential uses at the project site, which is identified as having a medium propensity for village development in the General Plan Land Use Element (see Figure 4.1-2), is within a Transit Priority Area, and within a SANDAG identified Smart Growth Opportunity Area. Specifically, the project is located in proximity to a planned Tecolote Trolley/Light Rail Transit (LRT) station proposed under the Mid-Coast Corridor Transit Project Trolley Blue Line Extension.

	Table 4.1-1		
	Summary of Project Consistency with Applicable Land Use Plans Goals and Objectives		
	Objectives Consistency Evaluation		
4	Enhance pedestrian circulation, particularly between higher density residential and commercial areas and to active and passive recreation facilities.	Consistent: As described in Section 3.3.5, the project would provide half-width frontage improvements to Morena Boulevard along the east side (northbound direction) to provide a 6-foot-wide Class 2 bike lane with a 3-foot buffer. Sidewalks would be provided along Frankfort Street, Morena Boulevard, and West Morena Boulevard. Internal pathways would be provided that connect to the surrounding roadways, providing pedestrian circulation to surrounding commercial areas.	
5.	Enhance the community's image through streetscape improvements and community identification signs along major streets.	The project would enhance the visual environment as viewed from the Morena Boulevard corridor by removing an existing, older RV park, older structures, and a storage yard. The project would construct a modern multi-family residential development and would install frontage improvements including landscaping and trees along the project frontage that would improve the visual image of the area. Proposed improvements include: street trees along both street frontages, trees along the perimeter of the site, and accent trees at the entrance to help distinguish and bring attention to the entrance.	
6.	Minimize adverse noise impacts.	Consistent: As described in Section 4.1.9, the project would be consistent with City noise standards and would not expose people to current or future noise levels exceeding standards of the General Plan. Noise attenuation measures included as part of the project design and implementation of mitigation measure (MM) LU-1 would ensure consistency with City noise standards.	

	Table 4.1-1
Summary of Project Consistency with Applicable Land Use Plans Goals and Objectives	
Objectives	Consistency Evaluation
 Open Space and Environmental Resources Objectives Reduce runoff and the alteration of the natural drainage system. 	Consistent: As described in Section 4.9, project design would predominately retain the existing drainage pattern and discharge runoff would flow to the same existing curb inlets. The connection to the public storm drain would be the same as in the existing condition; however, under post-project conditions, the runoff from approximately one acre of drainage area shifts from System 200 (the drainage area leading to the Morena Boulevard inlet) to System 100 (the inlet at the corner of Morena Boulevard and Frankfort). Drainage improvements are expected to improve the overall on-site drainage conditions.
7. Protect the resource value of artifacts and paleontological remains and the community's heritage for future generations.	Consistent: The project incorporates mitigation measures to require paleontological and archaeological monitoring during grading (MM CUL-1 and PALEO-1). Monitoring during grading would ensure that any artifacts or fossils are identified and their resource value is recorded.
Population-Based Parks and Recreation Objectives	Consistent: The project would incorporate private recreation facilities on
3. Increase recreational opportunities in new residential and commercial development.	site, including a swimming pool, cabanas, outdoor barbeques, and a fitness center.
Community Facilities Objectives3. Maintain water and sewer facilities to adequately serve the community.	Consistent: As described in Section 4.13, the project would not overburden existing water and sewer facilities.

Table 4.1-1	
	h Applicable Land Use Plans Goals and Objectives
Objectives CITY OF SAN DIEGO GENERAL PLAN	Consistency Evaluation
Land Use and Community Planning Element Applicable goals: A. City of Villages Strategy • Mixed-use villages located throughout the City and connected by high-quality transit.	Consistent: The project proposes a CPA to change the land use designation to Medium Density Residential and remove the CMCP Mobile Home Park Overlay. The project would implement the General Plan City of Villages strategy by intensifying residential uses at the project site, which is identified as having a medium propensity for village development in the General Plan Land Use Element (see Figure 4.1-2), is within a Transit Priority Area and within a SANDAG identified Smart Growth Opportunity Area. The project would add density within an area with access to high-quality transit due to its location adjacent to a high frequency bus stop at the intersection of Morena Boulevard and Frankfort Street. Additionally, the project site is located within one-half mile of the planned Tecolote Trolley/LRT station proposed under the Mid-Coast Corridor Transit Project Trolley Blue Line Extension.
 B. General Plan Land Use Categories Land use categories and designations that remain consistent with the General Plan Land Use Categories as community plans are updated and/or amended. 	Consistent: The project includes a CPA to remove the mobile park overlay and change the land use designation to Medium Density Residential, which is an existing General Plan Land Use Category appropriate to the project site.
 C. Community Planning Goals Community plans that maintain or increase planned density of residential land uses in appropriate locations. Community plans that are kept consistent with the future vision of the General Plan through comprehensive updates or amendments. 	Consistent: The CPA would increase the planned density of the project site consistent with the vision of the General Plan City of Villages strategy. While this amendment is proposed separate from the comprehensive community plan update (CPU) currently underway, the proposed development is anticipated to be in alignment with the City's goals for the CMCP CPU. Therefore, implementation of the proposed CPA is consistent with this objective.

	Table 4.1-1
	Applicable Land Use Plans Goals and Objectives
Objectives	Consistency Evaluation
 D. Plan Amendment Process Approve plan amendments that better implement the General Plan and community plan goals and policies. Allow for changes that will assist in enhancing and implementing the community's vision. 	Consistent: The CPA would revise the CMCP to remove incorrect references to the Coastal Trailer Villa RV park being a mobile home park and would remove the mobile park overlay from the project site. The proposed land use designation change to Medium Density Residential would implement the CMCP's goal to provide a diversity of housing options in selected locations of the community by developing 150 market-rate multifamily units. The project would also increase density along Morena Boulevard, an important transportation corridor with access to transit, and would be consistent with the General Plan City of Villages strategy.
 G. Airport Land Use Compatibility Protection of the health, safety, and welfare of persons within an airport influence area by minimizing the public's exposure to high levels of noise and risk of aircraft accidents. Protection of public use airports and military air installations from the encroachment of incompatible land uses within an airport influence area that could unduly constrain airport operations. 	Consistent: the project would prepare and submit a Form FAA 7460-1 - Notice of Proposed Construction or Alteration prior to issuance of a building permit. However, the project does not include any design features that would conflict with the requirements of San Diego International Airport (SDIA) ALUCP Airport Influence Area (AIA) Review Area 2. The project is limited to infill redevelopment for the construction of 150 market-rate multi-family units and would not exceed the CMCP height limit of 30 feet. Furthermore, the project site is not located within the SDIA ALUCP 60 decibel community noise equivalent level (CNEL) contour and is not subject to the plan's noise compatibility standards.

Table 4.1-1	
<u> </u>	Applicable Land Use Plans Goals and Objectives
 Objectives Mobility Element Applicable goals: A. Walkable Communities A city where walking is a viable travel choice, particularly for trips of less than one-half mile. A safe and comfortable pedestrian environment. A complete, functional and interconnected pedestrian network, that is accessible to pedestrians of all abilities. Greater walkability achieved through pedestrian-friendly street, site and building design. 	Consistency Evaluation Consistent: As described in Section 3.3.5 and discussed in Section 4.6.6, the project would provide half-width frontage improvements and provide appropriate pedestrian facilities along Morena Boulevard, West Morena Boulevard, and Frankfort Street, and would incorporate non-contiguous sidewalks along project frontage. The project would promote a safe and comfortable pedestrian environment through the use of landscaping. The double row of trees (trees along the property line and street trees in the right-of-way) will help create a comfortable pedestrian environment by providing shade over pavement. Furthermore, the addition of street trees within the right-of-way will provide a buffer between pedestrians
 B. Transit An attractive and convenient transit system that is the first choice of travel for many of the trips made in the City. Increased transit ridership. 	 and vehicles, creating a safer walking environment. Consistent: As described in Section 4.6.6, the existing bus stop bench located on Morena Boulevard immediately adjacent to the site, served by Route 105 would be temporarily removed and relocated to the same general area after the frontage improvements are complete. Additionally the project would install the following improvements at this transit stop: A concrete bus pad (12 feet wide by 75 feet long) on Morena Boulevard. Convenience features such as a bus shelter and trash can. Additionally, the project would intensify residential density in proximity to the proposed Tecolote Trolley/LRT station proposed under the Mid-Coast Corridor Transit Project Trolley Blue Line Extension, and thereby
 F. <u>Bicycling</u> A city where bicycling is a viable travel choice, particularly for trips of less than five miles. A safe and comprehensive local and regional bikeway network. 	increase Trolley/LRT ridership. Consistent: As described in Section 3.3.5, the project would provide halfwidth frontage improvements and would install a buffered Class 2 bike lane along the eastside (northbound direction) of Morena Boulevard.

Cable Land Use Plans Goals and Objectives Consistency Evaluation sistent: The project would meet City parking requirements for the
osed use by providing a total of 267 vehicular parking spaces, ding 2 accessible spaces. Parking would be accommodated in stached garages, 52 detached carports, 115 open (unassigned) ing spaces, and one detached garage. In addition, 70 bicycle parking es and 16 motorcycle parking spaces are proposed.
provide additional visual interest, depth and texture along the building walls. Additionally, street trees will help create a sense of unity along both street frontages.
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		Table 4.1-1
	· · · · · · · · · · · · · · · · · · ·	Applicable Land Use Plans Goals and Objectives
	Objectives	Consistency Evaluation
B.	 Distinctive Neighborhoods and Residential Design Innovative design for a variety of housing types to meet the needs of the population. Infill housing, roadways and new construction that are sensitive to the character and quality of existing neighborhoods. 	Consistent: The project would consist of infill development by converting the existing RV park to multi-family residential uses. According to current SANDAG estimates, the majority of residential development within the CMCP consists of single-family detached residential (61.9 percent) (SANDAG 2016a). The project would be development of 150 market-rate multi-family units providing residential options other than single-family detached.
Pu	blic Facilities, Services, and Safety Element	Consistent: As described in Section 4.12.4.1a, the project would not
	 pplicable goals: <u>Fire-Rescue</u> Protection of life, property, and environment by delivering the highest level of emergency and fire-rescue services, hazard prevention, and safety education. 	necessitate the construction of additional fire protection facilities. Additionally, the project would contribute funding to maintain fire protection services provided by the City through payment of Development Impact Fees (DIFs) that would be required prior to issuance of building permits.
E.	<u>Police</u>	Consistent: As described in Section 4.12.4.1b, the project would not
	 Safe, peaceful, and orderly communities. Police services that respond to community needs, respect individuals, develop partnerships, manage emergencies, and apprehend criminals with the highest quality of service. 	necessitate the construction of additional police protection facilities. Additionally, the project would contribute funding to maintain police protection services provided by the City through payment of DIFs that would be required prior to issuance of building permits.
F.	Wastewater	Consistent: All sewer facilities have been designed in accordance with the
	 Environmentally sound collection, treatment, re-use, disposal, and monitoring of wastewater. 	Sewer Design Guide (2013) by the Metropolitan Wastewater Department, City of San Diego. Refer to Section 4.13.4.1c.
G.	Storm Water Infrastructure	Consistent: As described in Section 4.9 and Section 4.10, project design
	 Protection of beneficial water resources through pollution prevention and interception efforts. A storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable. 	would predominately retain the existing drainage pattern and discharge runoff to the same existing curb inlets. The project would utilize biofiltration basins and Modular Wetland units to meet treatment requirements. These measures and additional measures outlined in Appendix G would effectively reduce pollutants in urban runoff.

		Table 4.1-1
	Summary of Project Consistency with	Applicable Land Use Plans Goals and Objectives
	Objectives	Consistency Evaluation
I.	 Waste Management Maximum diversion of materials from disposal through the reduction, reuse and recycling of wastes to the highest and best use. 	Consistent: The project would comply with all applicable City ordinances and the project specific Waste Management Plan (WMP) (see Appendix J), resulting in diversion of 96 percent of waste generated during demolition, grading and construction. During occupancy, an ongoing waste management plan would be implemented to include provisions for exterior storage space for refuse, recyclable, and landscape/green waste materials.
M.	 Public Utilities Public utilities that sufficiently meet existing and future demand with facilities and maintenance practices that are sensible, efficient and well-integrated into the natural and urban landscape. 	Consistent: The project has access to all utilities as described in Section 4.13 of this EIR. The project is an existing developed site and will connect to existing facilities in the surrounding roadway.
Q.	 Seismic Safety Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions. Development that avoids inappropriate land uses in identified seismic risk areas. 	Consistent: As described in Section 4.11.4, adherence to the recommendations presented in the preliminary geotechnical investigation prepared for the project and compliance with applicable California Building Code (CBC) regulations would ensure protection of public health and safety and structures are not at risk due to seismic conditions.
His	storic Preservation Element	Consistent: All on-site structures were evaluated for their potential
Ap A.	 plicable goals: <u>Identification and Preservation of Historical Resources</u> Identification of the historical resources of the City. Preservation of the City's important historical resources. 	historic significance. None of the on-site structures met the criteria for historic resources. Refer also to Section 4.4 and Appendix C of this EIR.

	Table 4.1-1
Summary of Project Consistency with Applicable Land Use Plans Goals and Objectives	
Objectives	Consistency Evaluation
 Recreation Element Applicable goals: F. Open Space Lands and Resource-Based Parks A system of pedestrian, bicycle and equestrian paths linking communities, neighborhoods, parks, and the open space system. 	Consistent: As described in Section 3.3.5 and discussed in Section 4.6.6.1, the project would provide half-width frontage improvements and would not conflict with planned bicycle and pedestrian improvements in the area. The project would install enhanced pedestrian sidewalks along the project frontage and a buffered bike lane.
 Conservation Element Applicable goals: Climate Change and Sustainable Development To reduce the City's overall carbon dioxide footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design techniques, and providing environmentally sound waste management. 	Consistent: As detailed in Section 4.15.5.1 and in Appendix K, the project would be consistent with the City's Climate Action Plan and would be required to implement a number of project features that would reduce greenhouse gas emissions, identified in the Climate Action Plan Consistency Checklist included as Appendix K. According to the landscape concept plan prepared by GMP Landscape Architecture and Planning dated November 16, 2017, there would be a total of 318 new trees planted, with 288 on-site and 30 within the public right-of-way. There would be an approximate increase of 46 percent in tree canopy square footage. The increase in tree canopy will help absorb carbon dioxide and assist in carbon sequestration (at 318 trees proposed, an annual reduction of 11.26 metric tons of CO ₂ equivalent would be reduced annually from the project).
 C. <u>Coastal Resources</u> Clean coastal waters by continuing to improve the quality of ocean outfall discharges. 	Consistent: The project would utilize biofiltration basins and Modular Wetland units to improve the water quality of runoff. Runoff from the project site would eventually enter Tecolote Creek, and would then travel an additional several hundred feet and discharge into Mission Bay at the Enchanted Cove near Fiesta Island. Refer to Section 4.10.4.
 Water Resources Management Effective long-term management of water resources so that demand is in balance with efficient, sustainable supplies. 	Consistent: The project has incorporated a number of water efficiency measures including low flow plumbing fixtures, drip irrigation, and low water use landscaping. Refer to Section 4.13.5.

		Table 4.1-1				
	Summary of Project Consistency with Applicable Land Use Plans Goals and Objectives					
	Objectives	Consistency Evaluation				
E.	 Urban Runoff Management Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays and wetlands. Preservation of natural attributes of both the floodplain and floodway without endangering life and property. 	Consistent: The project would utilize construction best management practices (BMPs) and permanent source control and treatment control BMPs to protect and preserve water quality. Refer to Section 4.10.4. As described in Section 4.9.5, the southern portion of the project site is located within FEMA Zone AO, which is designated as being within the 100-year floodplain. Consequently, the southern portion of the project site is within a Special Flood Hazard Area under the Environmentally Sensitive Lands Regulations of the SDMC. Consistent with the SDMC, construction of the project would include a net import of approximately 1,000 cubic yards in order to increase elevations and raise all portions of the project site on which housing would be constructed out of the 100-year floodplain. By raising elevations of all portions of the project site on which housing would be constructed out of the 100-year floodplain and the project would be consistent with ESL regulations related to Special Flood Hazard Areas and would protect life and property.				
F.	 Air Quality Regional air quality that meets state and federal standards. Reduction in greenhouse gas emissions effecting climate change. 	Consistent: As described in Section 4.14.4, the project would be consistent with all regional, state and federal air quality standards.				
I.	Sustainable Energy An increase in local energy independence through conservation, efficient community design, reduced consumption, and efficient production and development of energy supplies that are diverse, efficient, environmentally-sound, sustainable, and reliable.	Consistent: As detailed in Section 4.15.5.1 and in Appendix K, the project would implement a number of energy efficiency features including using 100 percent LED lights, LOW-e dual pane windows, R-9 insulation, EnergyStar appliances and implementation of Home Efficiency Rating System (HERS) testing to ensure operation efficiency.				

Table 4.1-1 Summary of Project Consistency with Applicable Land Use Plans Goals and Objectives				
Objectives	Consistency Evaluation			
Noise Element Applicable goals: A. Noise and Land Use Compatibility • Consider existing and future noise levels when making land use planning decisions to minimize people's exposure to excessive noise.	Consistent: A Noise Technical Report has been prepared for the project (see Appendix B) that considers existing and future noise levels and identifies measures to minimize people's exposure to excessive noise.			
 B. Motor Vehicle Traffic Noise Minimal excessive motor vehicle traffic noise on residential and other noise-sensitive land uses. 	Consistent: Exterior noise levels at outdoor use areas (pool and outdoor patios) have been minimized to the extent practical through installation of a 6-foot-high noise wall. With installation of this barrier, noise levels at outdoor use areas would be reduced to 72 CNEL, which is conditionally allowed for multiple unit and mixed-use residential uses in areas affected primarily by motor vehicle traffic noise.			
 Trolley and Train Noise Minimal excessive fixed rail-related noise on residential and other noise-sensitive land uses. 	Consistent: The project incorporates MM LU-1 that requires the building materials to achieve an interior noise level of 45 CNEL. Additionally, the project design incorporates a noise wall to reduce noise levels at outdoor use area.			
 D. <u>Aircraft Noise</u> Minimal excessive aircraft-related noise on residential and other noise-sensitive land uses. 	Consistent: The project site is outside the 60 CNEL contour of San Diego International Airport. Noise-sensitive receptors would not be exposed to excessive aircraft noise.			
 G. Construction, Refuse Vehicles, Parking Lot Sweepers, and Public Activity Noise Minimal exposure of residential and other noisesensitive land uses to excessive construction refuse vehicles, parking lot sweeper-related noise and public noise. 	Consistent: The project incorporates MM NOI-1 that requires implementation of a number of measures during construction to reduce noise at off-site properties.			
 Typical Noise Attenuation Methods Attenuate the effect of noise on future residential and other noise-sensitive land uses by applying feasible noise mitigation measures. 	Consistent: MM LU-1 and NOI-1 have been applied to this project to minimize adverse noise effects.			

4.2 Noise

The following section is based upon the noise technical report titled Assessment of Environmental Noise prepared by Veneklasen Associates, Inc. (Appendix B).

4.2.1 Existing Conditions

Noise measurements were taken on the project site on Wednesday, August 24, 2016, to document ambient noise levels. Noise measurements were taken from a single location on the western property line of the project site. Noise readings were measured over 5-minute intervals with "A" frequency fast time weighting. Primary sources of noise surrounding the project site include vehicular traffic on Morena Boulevard, West Morena Boulevard and Interstate 5 (I-5), as well as the Los Angeles-San Diego-San Luis Obispo (LOSSAN) rail corridor located west of the project site, between I-5 and Morena Boulevard. The 1-hour average sound level (L_{eq}) at the monitor position was measured at 71 A-weighted decibels [dB(A)]. The community noise equivalent level (CNEL) noise level from the short-term measurements was calculated to be 75 CNEL.

4.2.2 Regulatory Framework

Refer to Section 4.1, Land Use for a discussion of the General Plan Noise Element regulatory framework.

4.2.2.1 Municipal Code - Noise Ordinance

For multi-family residential, Article 9.5 of the San Diego Municipal Code states that the one-hour average sound level cannot exceed 55 dB(A) between 7:00 a.m. and 7:00 p.m., 50 dB(A) between 7:00 p.m. and 10:00 p.m., and 45 dB(A) between 10:00 p.m. and 7:00 a.m. The one-hour average sound level at single-family residential properties cannot exceed 50 dB(A) between 7:00 a.m. and 7:00 p.m., 45 dB(A) between 7:00 p.m. and 10:00 p.m., and 40 dB(A) between 10:00 p.m. and 7:00 a.m. Noise subject to these limits is that part of the total noise at the specified location that is due solely to the action of said person.

Article 9.5 of the San Diego Municipal Code also states that it shall be unlawful to conduct construction activities between 7:00 p.m. and 7:00 a.m., or on legal holidays, that would create disturbing, excessive, or offensive noise unless a permit has been applied for and granted beforehand. Additionally, it shall be unlawful to conduct construction activity so as to cause, at or beyond the property lines of residential property, an average sound level greater than 75 dB(A) during daytime hours.

4.2.2.2 City of San Diego - Ground-borne Vibration

The City of San Diego (City) does not establish criteria for maximum vibration thresholds. The Federal Transit Administration (FTA) provides standards and guidelines for perceptibility and annoyance for ground-borne vibration as well as construction vibration impact criteria for building damage. In most circumstances common ground-induced vibrations related to roadway traffic and construction activities pose no threat to buildings or structures. For smooth roadways, the ground-borne vibration from traffic is barely perceptible.

The FTA has published a technical manual titled, Transit Noise and Vibration Impacts Assessment, that provides ground-borne vibration impact criteria with respect to building damage and human response during construction activities. Building vibration damage is measured in peak particle velocity described in the unit of inches per second. Table 4.2-1 presents the FTA vibration criteria for construction activities. A vibration criterion of 0.20 inch per second is identified as the significance threshold for non-engineered timber and masonry buildings (Category III), while 0.50 inch per second is identified as the significance threshold for structures or buildings constructed of reinforced-concrete, steel, or timber (Category IV).

Table 4.2-1 Federal Transit Administration Construction Vibration Impact Criteria for Building Damage			
Peak Particle Veloc			
Building Category	(inch per second)		
I. Reinforced-concrete, steel or timber (no plaster)	0.5		
II. Engineered concrete and masonry (no plaster)	0.3		
III. Non-engineered timber and masonry buildings	0.2		
IV. Buildings extremely susceptible to vibration damage	0.12		
SOURCE: Federal Transit Administration 2006.			

Table 4.2-2 presents thresholds for human response to vibration levels. The FTA vibration criteria for residential uses (Category 2) states that impacts would occur at a 72 vibration level in decibels (VdB) for frequent events occurring more than 70 times per day, at 75 VdB for occasional events occurring between 30 and 70 times per day, and at 80 VdB for infrequent events occurring less than 30 times per day.

Federal Transit Administration Ground-Borne Vibration Impact Criteria for General Assessment			
GBV Impact Levels			
	(VdB re 1 micro-inch /sec)		/sec)
	Frequent	Occasional	Infrequent
Land Use Category	Events ¹	Events ²	Events ³
Category 1: Buildings where vibration would interfere with interior operations	65 VdB ⁴	65 VdB ⁴	65 VdB ⁴
Category 2: Residences and buildings where people normally sleep	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use	75 VdB	78 VdB	83 VdB

Table / 2-2

SOURCE: Federal Transit Administration 2006.

VdB = vibration level in decibels.

4.2.3 Significance Determination Thresholds

The following criteria are used by the City to determine significance under California Environmental Quality Act (CEQA) related to noise impacts.

1. Significance Determination Thresholds Related to Construction Noise

Temporary construction noise which exceeds 75 dB (A) Leq at a sensitive receptor would be considered significant. Construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75-decibels (dB) during the 12-hour period from 7:00 a.m. to 7:00 p.m. In addition, construction activity is prohibited between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, that would create disturbing, excessive, or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator, in conformance with San Diego Municipal Code Section 59.5.0404.

¹"Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.

²"Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.

³"Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.

⁴This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the heating, ventilation, and air conditioning systems and stiffened floors.

Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors, such as day care facilities, a significant noise impact may be identified.

2. Significance Determination Thresholds Related to Operational Noise (Land Use Compatibility)

The generation of noise for certain types of land uses could cause potential land use incompatibility. A project which would generate noise levels at the property line which exceed Section 59.5.0401 of the City's Municipal Code would be considered to have a potentially significant environmental impact, as identified in Table 4.2-3.

Table 4.2-3 Sound Level Limits				
	Noise Level [dB(A)]			
	7:00 A.M. to	7:00 P.M. to	10:00 р.м. to	
Receiving Land Use Category	7:00 р.м.	10:00 р.м.	7:00 A.M.	
Single-family Residential	50	45	40	
Multi-family Residential (up to a maximum density of 1 dwelling unit/2,000 square feet)	55	50	45	
All Other Residential	60	55	50	
Commercial	65	60	60	
Industrial or Agricultural	75	75	75	
SOURCE: City of San Diego, Municipal Code Section 59.5.0401				

3. Significance Determination Thresholds Related to Operational Noise (Traffic Noise)

The City's Significance Thresholds for determining interior and exterior noise impacts from traffic-generated noise are presented in Table K-2 of the City's CEQA Significance Determination Thresholds. That table is presented in Table 4.2-4.

Table 4.2-4 Traffic Noise Significance Thresholds [dB[A] CNEL]				
Structure or Proposed Use that would be Impacted by Traffic Noise	Interior Space	Exterior Useable Space ¹	General Indication of Potential Significance	
Single-family detached	45 dB	65 dB	Ü	
Multi-family, school, library, hospital, day care center, hotel, motel, park, convalescent home	Development Services Department ensures 45 dB pursuant to Title 24	65 dB	Structure or outdoor useable area is <50 feet from the center of the closest (outside) lane on a street with existing or future ADTs >7,500	
Office, church, business, professional uses	n/a	70 dB	Structure or outdoor useable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >20,000	
Commercial, retail, industrial, outdoor spectator sports uses	n/a	75 dB	Structure or outdoor useable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >40,000	

SOURCE: City of San Diego Acoustical Report Guidelines (December 2003).

ADT = average daily trips

4.2.4 Issue 1: Ambient Noise Levels

Would the project result in or create a significant increase in the existing ambient noise levels which exceed the City's adopted ordinances or thresholds?

4.2.4.1 Impacts

The analysis of impacts under issue question 1 addresses Significance Determination Thresholds 1 through 3 as detailed in Section 4.2.3, above.

a. Construction Noise

Construction activities would temporarily increase ambient noise levels in the project vicinity. Construction noise impacts were analyzed for long-term noise exposure due to all anticipated construction equipment operating during each phase of construction as well as for short-term noise exposure from equipment operating along the project site perimeter. Noise levels associated with

¹If a project is currently at or exceeds the significance thresholds for traffic noise described above and noise levels would result in less than a 3 dB increase, then the impact is not considered significant.

equipment type for each activity were predicted for each phase in the proposed construction schedule at various locations around the project site. The noise levels predicted include the short-term noise levels while construction activity occurs along the project site boundaries. Construction is expected to begin in the summer of 2018 and be completed by the end of 2019.

The nearest off-site sensitive receivers (single-family residences) are located to the north, south, and east of the project site. The property lines of the sensitive receivers are approximately 50 feet from the perimeter of the project site. The maximum predicted hourly average noise levels at these sensitive receptors due to construction operations are shown in Table 4.2-5 below.

Table 4.2-5 Measured Noise Levels of Common Construction Equipment				
	Existing Noise Level at Project Site Boundaries	Construction Noise Level at Project Site Boundaries		
Noise Source	[L _{eq} dB(A)]	[L _{eq} dB(A)]		
Building Demolition	56-73	75		
Asphalt Demolition	56-73	73		
Site Preparation	56-73	78		
Grading	56-73	76		
Utility Trenching & Installation	56-73	72		
Building Construction	56-73	75		
Asphalt Paving	56-73	70		
Architectural Coating	56-73	62		
L _{eq} = average sound level; dB(A) = A-weighted decibels				

Table 4.2-5 shows that project construction would potentially generate noise levels up to 78 dB(A) at sensitive receptors surrounding the project, which would exceed the City's Municipal Code noise limit of 75 dB(A). The highest noise levels would occur during the site preparation and grading phases. Construction noise in excess of the City's Municipal Code noise limit of 75 dB(A) would be considered a significant impact.

b. Ground-borne Vibration

The project is not anticipated to include construction activities known to cause significant vibration impacts such as pile driving or blasting. Other project construction activities, such as the use of jackhammers, other high-power or vibratory tools, compactors, and tracked equipment, can generate substantial vibration in the immediate vicinity, typically within 25 feet of the equipment. However, the distance from the center of construction activities to adjacent receivers would be greater than 25 feet. As a result, typical construction activities would not generate substantial vibration that would be perceptible to receivers, and impacts would be less than significant.

The project site is approximately 175 feet from the LOSSAN rail corridor currently serving San Diego Coaster and Amtrak trains. According to the posted schedule, there are a total of 30 trains that pass-by the project site per day. According to the FTA guidelines, this would fall into the occasional events category. For occasional events, the criterion for ground-borne vibration is 75 VdB. Measurements of train pass-bys conducted at the project site determined that the maximum vibration levels was 58

VdB, well below the applicable FTA criteria. Therefore, vibration impacts would be less than significant.

c. Operational Noise

Once operational, the project would generate noise from vehicular trip generation and from typical noise sources associated with multi-family residential use. These sources of operational noise are discussed below.

Traffic Noise

The project would contribute traffic to area roadways. A significant impact would occur if project implementation would expose on- or off-site, existing, and planned sensitive uses to road noise 3 dB over existing noise levels. Changes in CNEL levels were calculated for potential future noise conditions due to future traffic volumes associated with the project and increases in background traffic based on the Traffic Impact Analysis (TIA) prepared for the project. Table 4.2-6 shows the calculated decibel effects due to traffic changes, regardless of distance to the project site. As shown in Table 4.2-6, the project would be well below the threshold of an increase of 3.0 CNEL, and impacts associated with project-generated traffic would be less than significant.

Table 4.2-6 Traffic Noise Levels				
Increase in Noise Level				
Road	from Project Traffic	Significant Impact?		
Morena Boulevard (Frankfort Street to Knoxville Street)	0.2 CNEL	No		
West Morena Boulevard (Asher Street to Morena Boulevard)	0.0 CNEL	No		

Stationary Noise

Mechanical equipment, including split-system outdoor condensing units (air conditioning units), would be a primary stationary noise source associated with the project. Calculations of operational noise were based on published sound power data for units of typical residential size, using an assumption that three units would be operating simultaneously. As detailed in the noise report, noise from residential split-system condensing units could reach a power level sound of 75 dB(A), thereby exceeding the nighttime single-family residential property line limit of 40 dB(A), resulting in a potentially significant impact.

4.2.4.2 Significance of Impacts

a. Construction Noise

The project would exceed Significance Determination Threshold 1, above because construction noise is anticipated in excess of the 75 dB(A) threshold, reaching noise levels up to 78 dB(A) at

sensitive receptors surrounding the project. Therefore, construction noise impacts would be significant.

b. Ground-borne Vibration

The project would not result in impacts associated with construction related ground-borne vibrations based on the significance thresholds identified above. Project construction is not expected to require the use of vibration producing equipment. Additionally, train activity associated with the LOSSAN rail corridor would generate vibration levels below FTA criteria. Thus, impacts related to ground-borne vibration would be less than significant.

c. Operational Noise

The project would not result in operational noise impacts associated with traffic noise based on Significance Determination Threshold 3 identified above. The project would generate traffic that would result in a noise increase of 0.2 CNEL, which is below the significance threshold of a 3.0 CNEL increase in noise. Operational traffic noise impacts would be less than significant.

The project would not result in operational noise impacts associated with land use compatibility based on Significance Determination Threshold 2 identified above. Operational noise associated with mechanical equipment would be significant due to nighttime noise levels potentially in excess of the single-family residential property line limit of 40 dB(A).

4.2.4.3 Mitigation, Monitoring, and Reporting

NOI-1: Construction Noise

Adherence to the following measures would reduce construction noise levels at adjacent properties to acceptable levels.

- Site preparation and grading phases should be scheduled to limit the number of heavy construction machines operating simultaneously.
- Install a temporary construction noise barrier at the northern, southern, and eastern property lines of the project site in order to reduce the noise impacts to the residential uses. The barrier should block the line of sight from the noise source to the receiver and have no holes or gaps. The minimum density should be 2 pounds per square foot.
- Limit construction activity to the hours of 7:00 a.m. to 7:00 p.m.
- Schedule highest noise-generating activity and construction activity away from noisesensitive land uses.
- Equip internal combustion engine-driven equipment with original factory (or equivalent) intake and exhaust mufflers which are maintained in good condition.
- Prohibit and post signs prohibiting unnecessary idling of internal combustion engines.
- Locate all stationary noise-generating equipment such as air compressors and portable generators as far as practicable from noise-sensitive land uses.

- Utilize "quiet" air compressors and other stationary equipment where feasible and available.
- Designate a noise disturbance coordinator who would respond to neighborhood complaints about construction noise by determining the cause of the noise complaints and require implementation of reasonable measures to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site.

NOI-2: Mechanical Equipment Siting and Screening

Prior to approval of building permits, the applicant shall demonstrate on building plans that the residential split-system condensing units (air conditioning units) are located a minimum of 60 feet from the closest single-family residential property line or shall provide acoustical screening between the unit and the property line.

4.2.4.4 Significance of Impacts after Mitigation

a. Construction Noise

Implementation of mitigation measure NOI-1 would reduce impacts associated with construction noise to less than significant.

b. Ground-borne Vibration

Impacts would be less than significant. No mitigation is required.

c. Operational Noise

Implementation of NOI-2 would ensure that operational noise impacts associated with the residential split-system condensing units are reduced to less than significant.

4.3 Paleontological Resources

This section evaluates potential impacts to paleontological resources that could result from implementation of the project. The impact analysis is based on the Preliminary Geotechnical Investigation and Geotechnical Addendums prepared by LGC Valley, Inc. included as Appendices H-1 through H-3 and secondary sources information including studies of geologic formations and sensitive resources.

4.3.1 Existing Conditions

Paleontological resources represent a limited, nonrenewable, and impact-sensitive scientific and educational resource. Paleontological resources are the remains and/or traces of prehistoric plant and animal life exclusive of man. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities.

Paleontological resource sensitivities are rated for individual formations and recognize the important relationship between fossils and the geologic formations within which they are entombed. Geologic formations are rated for paleontological resource potential according to the following scale (Deméré and Walsh 1994).

- High Sensitivity These formations contain a large number of known fossil localities. Generally, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.
- Moderate Sensitivity These formations have a moderate number of known fossil localities.
 Generally, moderately sensitive formations produce invertebrate fossil remains in high abundance or vertebrate fossil remains in low abundance.
- Low and/or Unknown Sensitivity These formations contain only a small number of known fossil localities and typically produce invertebrate fossil remains in low abundance. Unknown sensitivity is assigned to formations from which there are presently no known paleontological resources, but which have the potential for producing such remains based on their sedimentary origin.
- Very Low Sensitivity Very low sensitivity is assigned to geologic formations that, based on their relative youthful age and/or high-energy depositional history, are judged to be unlikely to produce any fossil remains.

According to the Geotechnical Investigation and Geotechnical Addendum (see Appendices H-1 and H-2), the project site is underlain by undocumented artificial fill over Quaternary-aged Alluvium and Pleistocene-aged Old Paralic Deposits (Bay Point Formation, Qbp). The alluvium, consisting of silty fine to coarse sands, clayey sands, and fine sandy clays, were encountered in the southeastern portion of the site. The Old Paralic Deposits, consisting mainly of poorly sorted, orange to reddish-brown, silty fine to coarse sand, gravelly sands and sandy to gravelly conglomerates, were encountered beneath the alluvium in the southeastern portion of the site and at grade in the northern portion of the site. The paleontological resource potential of these underlying formations is as follows (City of San Diego 2016a):

- Pleistocene-aged Old Paralic Deposits (Bay Point Formation, Qbp) High Sensitivity
- Quaternary-aged Alluvium Low Sensitivity

4.3.2 Significance Determination Thresholds

The following criteria are used by the City to determine significance under California Environmental Quality Act (CEQA) related to paleontological resources. A project would have a significant environmental impact if it would require:

- 1. Over 1,000 cubic yards of excavation at a depth greater than 10 feet in a high resource potential geologic deposit/formation/rock unit; and/or
- 2. Over 2,000 cubic yards of excavation at a depth greater than 10 feet in a moderate resource potential geologic deposit/formation/rock unit.

Additionally, the Significance Determination Thresholds provide the following additional guidance to assist in determining significance:

- If there are sedimentary rocks such as those found in the coastal areas, they usually contain fossils.
- Monitoring is always required when grading on a fossil recovery site or near a fossil recovery site in the same geologic deposit/formation/rock unit as the project site as indicated on the Kennedy Maps.
- Monitoring may be required for shallow grading (i.e., <10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface.
- Monitoring is not required when grading documented or undocumented artificial fill.

4.3.3 Issue 1: Paleontological Resources

Would the project require over 1,000 cubic yards of excavation at a depth greater than 10 feet in a high resource potential geologic deposit/formation/rock unit, or require over 2,000 cubic yards of excavation at a depth greater than 10 feet in a moderate resource potential geologic deposit/formation/rock unit (unless sensitive geologic formations are present at a shallower depth)?

4.3.3.1 Impacts

The analysis of impacts under Issue 1 addresses Significant Determination Thresholds 1 and 2 as detailed in Section 4.3.2, above. The project site is underlain by Pleistocene-aged Old Paralic Deposits (Bay Point Formation, Qbp), which has a high potential for containing fossils. The project would result in fill at the lower elevation areas of the project site near Morena Boulevard and would require cut at the higher elevations of the site near Tonopah Avenue. Based on a review of boring logs completed for the Geotechnical Investigation, the geology underlying the site near Tonopah Avenue (Geotechnical Boring Log B-3) is underlain by Quaternary Bay Point Formation at a depth of approximately 4 feet. In this location, grading (cut) may occur up to a depth of 9 feet and would have the potential to impact Bay Point Formation, which has a high potential for paleontological resources. Thus, although grading depth would not exceed 10 feet per the significance threshold provided in Section 4.3.2, the site has been previously graded and a geologic formation with high resource potential is located near the surface. Thus, impacts to paleontological resources would be potentially significant.

4.3.3.2 Significance of Impacts

Implementation of the project has the potential to result in significant impacts to paleontological resources based on the significance determination thresholds identified above due to shallow grading that may affect Bay Point Formation, a geologic formation with high paleontological resource sensitivity. Impacts would be significant.

4.3.3.3 Mitigation, Monitoring, and Reporting

The project would implement mitigation measure PALEO-1, which would require paleontological monitoring during grading (cut), as described below:

PALEO-1: Paleontological Monitoring

- I. Prior to Permit Issuance
 - A. Entitlements Plan Check
 - 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that

the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD

- 1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines.
- 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
- 3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

- 1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
- 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

- 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a

site specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

- a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

- The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the PME.
- 2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
- 3. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

- 1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
- 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

- 1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
 - d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

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

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

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Section III - During Construction.

- c. Potentially Significant Discoveries
 - If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III During Construction shall be followed.
- d. The PI shall immediately contact MMC, or by 8 a.m. on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night work becomes necessary during the course of construction
 - 1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

V. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
 - a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with the San Diego Natural History Museum
 - The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.
 - 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 - 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
 - 4. MMC shall provide written verification to the PI of the approved report.
 - 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains

- 1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
- 2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate
- C. Curation of fossil remains: Deed of Gift and Acceptance Verification
 - 1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
 - 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
- D. Final Monitoring Report(s)
 - 1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
 - 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

4.3.3.4 Significance of Impacts after Mitigation

Implementation of the mitigation measure outlined above would reduce potential impacts to less than significant because it would provide for monitoring during grading and defines the requirement for recovery of fossil material that otherwise could be lost during grading.

4.4 Cultural Resources

This section discusses whether the project has the potential to cause a substantial adverse effect on a cultural or historical resource. Cultural resources include all properties or sites that are eligible or potentially eligible for the National Register of Historic Places (NRHP), as well as those that may be significant pursuant to state and local laws and registration programs such as the California Register of Historical Resources (CRHR) or the City of San Diego (City) Historical Resources Register. Historical resources include buildings, structures, objects, archaeological sites, districts, landscaping, and traditional cultural properties possessing physical evidence of human activities that are typically over 45 years old, regardless of whether they have been altered or continue to be used. As part of the project review, information was compiled to assist with a determination of historic significance of on-site structures consistent with San Diego Municipal Code Section 143.0212. Information related to the Historical Resource Review is provided in Appendix C.

4.4.1 Existing Conditions

4.4.1.1 Known Prehistoric/Historic Resources

a. Cultural Setting

The prehistoric cultural sequence in San Diego County is generally composed of three basic periods: the Paleoindian, dating between about 11,500 and 8,500 years ago; the Archaic, lasting from about 8,500 to 1,500 years ago (A.D. 500); and the Late Prehistoric, lasting from about 1,500 years ago to historic contact (i.e., A.D. 500 to 1769).

The Paleoindian period in San Diego County is manifested by the artifacts of the San Dieguito Complex, which consists of well-made scraper planes, choppers, scraping tools, crescentics, elongated bifacial knives, and leaf-shaped points. The San Dieguito Complex is thought to represent an early emphasis on hunting.

The Archaic period is manifested by the cobble and core technology of the La Jollan Complex, and reflects a shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. Along with an economic focus on gathering plant resources, the settlement system appears to have been fairly sedentary. The La Jollan Complex is dominated by rough, cobble-based choppers and scrapers, and slab and basin metates. Large deposits of marine shell at coastal sites suggest the importance of shellfish gathering to the coastal Archaic economy.

The Late Prehistoric period in San Diego County is represented by the Cuyamaca Complex and patterns that suggest the emergence of the enthohistoric Kumeyaay. This period is marked by the appearance of ceramics, small arrow points, and cremation burial practices, as well as by higher

population densities and elaborations in social, political, and technological systems. Economic systems diversify and intensify during this period, with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, but effective technological innovations.

The people who lived in what became San Diego County prior to the Spanish invasion are today known as the Kumeyaay. Traditional Kumeyaay territory extended over the southern two-thirds of San Diego County, from Agua Hedionda (south of Carlsbad) south to some 20 miles below Ensenada, Baja California Norte. On the west, their territory started at the Pacific Ocean and extended to the mountains of the Peninsular Range and into the desert just beyond (Cline 1984; Gifford 1931:1-2; Spier 1923:298).

Subsistence focused on gathering plant foods. Acorns are thought to have been the most important dietary staple for the Kumeyaay (e.g., Luomala 1978:600; Spier 1923:334). Seeds from sages, grasses, and other plants were also dietary staples. Hunting contributed to the diet in a minor way. It was focused on small game, primarily rabbits and rodents. These were taken with bow and arrow, throwing stick, or nets. Hunting of large game was somewhat less important in the diet, with deer and bighorn sheep taken on occasion. Large game provided leather and sinew for clothing and crafts.

The Kumeyaay traditionally maintained a territorially associated band structure (Luomala 1978:602; Shipek 1982:297; Gifford 1973:378). The household was the primary social structure and consisted of a married couple together with their unmarried children, married sons and families, and dependent relatives within the father's lineage such as his parents, grandparents, and unmarried aunts or uncles (May 1975:3). At any one time, the Kumeyaay band usually maintained a main village and several outlying villages (May 1975:4; Shipek 1982:297; Luomala 1978:597). Since the economy was based on intensive utilization of locally available natural resources, these settlements were more or less temporary. Residential units often split into their constituent clans when movement to other areas was necessitated either by seasonal changes or by local overexploitation. A "permanent" village, as recorded by early European explorers, probably consisted of an area that was regularly used by local band members for a large part of the yearly cycle (Luomala 1978:597).

A wide range of tools were made of locally available and imported materials. A simple shoulder-height bow was utilized for hunting. Numerous other flaked stone tools were made including scrapers, choppers, flake-based cutting tools, and biface knives. Preferred stone types were locally available metavolcanics, cherts, and quartz. Obsidian was imported from the deserts to the north and east. Ground stone objects include mortars and pestles typically made of locally available, fine-grained granite. Both portable and bedrock types are known. The Kumeyaay made fine baskets, employing either coiled or twined construction. The Kumeyaay also made pottery, utilizing the paddle-and-anvil technique. Most were a plain brown utility ware called Tizon Brown ware, but some were decorated (Meighan 1954; May 1976, 1978).

A period of historic contact began in San Diego County in the mid-1700s, beginning with the Spanish (1769–1821), followed by the Mexican (1822–1848) and American (starting mid-1800s) homestead systems. One of the hallmarks of the Spanish colonial period was the rancho system. In an attempt to encourage settlement and development of the colonies, large land grants were made by the Spanish to meritorious or well-connected individuals.

During the Mexican colonial period, the mission system was secularized by the Mexican government and these lands allowed for the dramatic expansion of the rancho system. The local economy became increasingly based on cattle ranching. The Mexican period ended when Mexico signed the Treaty of Guadalupe Hidalgo in 1848, concluding the Mexican-American War. The great influx of Americans and Europeans resulting from the California Gold Rush in 1848-49 eliminated many remaining vestiges of Native American culture.

The American homestead system encouraged settlement beyond the coastal plain into areas where Indians had retreated to avoid the worst of Spanish and Mexican influences (Carrico 1987; Cook 1976). A rural community cultural pattern existed in San Diego County from approximately 1870 to 1930. These communities were composed of an aggregate of people who lived within well-defined geographic boundaries, on farmsteads tied together through a common school district, church, post office, and country store (Hector and Van Wormer 1986). In the post-World War II period, the economy shifted from ranching and agriculture to light manufacturing, the military, and tourism.

Mission Bay was originally named False Bay by Juan Rodriguez Cabrillo. At various times after the establishment of the San Diego Presidio the San Diego River would alter course and switch its channel between False Bay and San Diego Bay. At the time of the Spanish establishment of the Presidio, False Bay was deep enough to admit vessels of considerable size, but by 1810 it had silted up to such an extent that at low tide only small sail boats could navigate it (Pourade 1960). The most recent switch was in 1825; the increased flow of the river cut a new channel that ran southwest into San Diego Bay. In 1853-54 Lieutenant George Horatio Derby of the United States Army Corps of Engineers oversaw construction of a dike, known as the Derby Dike, to permanently divert the flow of the San Diego River away from San Diego Bay and into False Bay to prevent it from silting up (Pourade 1960). Derby Dike failed within a short time, but a permanent channel was eventually constructed. An offshoot of this channel was the isolation of False Bay.

In the late 1800s some recreational development began on what was still called False Bay, mostly consisting of fishing and hunting facilities. These facilities were subject to occasional destruction by flooding. Little development occurred in False Bay through the early 1900s. In 1929 the state switched the False Bay lands from the State Harbor Commission to the Division of Parks. The City of San Diego began planning for the development of the bay in 1930, but the Depression postponed any actual development. A tentative landscape plan was developed in 1939, but again actual work was delayed by World War II. Dredging began in 1946, and was completed in 1956. In 1956-57 preliminary master plan drawings were prepared. Additional dredging occurred in 1959-1961, and the sands obtained were used at Fiesta Island and Santa Clara Point. Roads, shore revetment, parking lots, restrooms, utilities to various points, and landscaping were constructed between 1962 and 1965.

In 1887 the 1,200-acre Morena subdivision was mapped. It was bounded by Morena Boulevard on the west, Milton Street on the south, Illion Street on the east, and on the north by an east-west line approximately 1,000 feet north of what is now Gesner Street. In 1887 a train depot was constructed in the vicinity of Kane Street and Morena Boulevard to accommodate potential buyers in the Morena subdivision. It was torn down in the early 1920s. By 1953 most of the area east of Morena Boulevard and south of Clairemont Drive had been developed, mostly for residential developments.

The single-family house at 1623 Morena Boulevard located on the project site was constructed in 1939 as was the small barn in the center of the northern project parcel. The house was originally set about 40 feet north of its current location, but was later moved to its current location between 1953 and 1964. Several other small outbuildings also occupied this parcel, but all have been demolished in the past. The RV park was constructed in 1947, as was the house at 1597½ Morena Boulevard. The duplex at 1639/1641 Morena Boulevard was constructed in 1950 and the duplex at 1643/1645 Morena Boulevard was constructed in 1959.

b. Records Search

Qualified City staff conducted an archaeological data base search and no archaeological sites have been mapped in or adjacent to the project site. Although no historical resources were identified within the boundaries of the project site, recorded sites have been identified within proximity to the project site.

c. Field Inspection

A site visit, record search, and photo survey were conducted of the permanent buildings on the project site as a part of the initial Historical Resource Review conducted by the City. This review included a photographic survey of the permanent buildings on-site; site plan; and information including building descriptions, notices of completion, chains-of-title, and a list of occupants. The Historic Resource Review documentation is included as Appendix C and a summary of the on-site buildings and structures is provided below.

Description of Buildings/Structures on the Northern Parcel (APN 436-020-4000)

The five buildings on the northern parcel consist of two duplexes, a single-family dwelling, a garage, and a barn. The structure is a large metal-sided shed. The two duplexes, with the addresses 1639/1641 Morena Boulevard and 1643/1645 Morena Boulevard, are identical in layout and construction. They are single-story, rectangular buildings constructed of cinderblock, on slab foundations. The roofs are side-gabled, cladding is stucco, and windows are metal framed. A small roof extension covers each door.

The single-family house, at 1623 Morena Boulevard, is a single-story, wood-framed building. The architectural style is a basic vernacular style, with a small amount of Italianate influence in the bay window, pyramid roof, and boxed eaves. The roof is pyramidal, with a low pitch angle, and eaves are boxed. The house is cladded in horizontal aluminum siding in clapboard style. Windows are wood framed and double hung. There is a shed roof covering a porch on the rear (northeast) of the house.

The fourth building is a garage, approximately 25 feet by 25 feet, with a side-gabled, low pitch angle roof with open eaves. The garage is constructed of cinderblock. The front faces northwest with an upward opening wood door. There is a narrow entrance door on the immediate left of the main door. The rear and northeast windows are boarded up. The southeast side of the garage has two evenly spaced eight-light metal-framed casement windows.

The fifth building is a small, wood-framed barn located in the central portion of the parcel. It has a front gable roof, with a moderately steep pitch angle, with close eaves on the front and back and

open eaves on the sides. There were originally extensions on both sides but these have been removed. Cladding is simple drop wood siding, laid horizontally. The front faces south, with a centrally located vertical batten constructed wood door. Most windows are boarded up; however, visible windows have wood frames of various styles. There are loft access openings on the front and back.

The metal shed has a flat roof of corrugated metal sheets. There is a front door approximately 18 feet wide, set on the south side of the west-facing façade. The walls are flat metal sheets of varying sizes. There are sheet metal covered windows/openings on the back and north walls. The south half has a concrete slab floor; the remainder of the floor may be dirt.

Description of Buildings/Structures on the Southern Parcel (APN 436-020-4100)

The three buildings on the southern parcel consist of a residence, a laundry room/storage room building, and a small office. In addition, there are 33 small bathroom/shower buildings adjacent to RV stalls for use by residents.

The residence at 1597½ Morena Boulevard is single-story, with a rectangular footprint oriented with the long axis running east-west. A two-car garage is attached to the east end of the residence. The hipped roof has a shallow pitch angle, and the eaves are boxed and narrow. The building is cladded in stucco. The architecture is very utilitarian, probably closest to Minimal Traditional but with no typical detailing such as shutters, chimney, or front-facing gable. There is a partial front porch, covered by a shed roof of shallow pitch angle. Both ends of the porch are closed off. The original windows are eight-light, metal framed casement windows, while replacement windows are metal framed sliding style.

The laundry room/storage building is a single-story, rear-facing L-shaped building with a low pitch angle, cross-hipped, roof. The walls are cladded in stucco. The windows are metal-framed sliding-style, except for a single replacement metal framed sliding style window. A single-car carport has been added to this side of the building, and a water heater closet is attached to the rear.

The 33 bathroom/shower buildings vary in detail but share basic structural characteristics and layout. They have a very shallow pitch, simple hipped roof with close eaves. In 31 of the buildings, the walls are poured concrete, possible precast. The remaining three buildings are constructed of cinderblock. These are roughly constructed, with block slightly misaligned and some extruding mortar. In the east elevation is a door and two small square metal vents.

4.4.2 Regulatory Framework

4.4.2.1 Federal

a. National Historic Preservation Act of 1966 and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as the official Federal list of cultural resources that have been nominated by State offices for

their significance at the local, State, or Federal level. Listing on the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) on the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing on the NRHP.

Criteria for listing on the NRHP are stated in Title 36, Part 60 of the Code of Federal Regulations (36 CFR 60). A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association; and where such resources:

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

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the California Environmental Quality Act (CEQA) Guidelines (Section 15065.5).

4.4.2.2 State

a. California Register of Historic Resources (Public Resources Code Section 5020 et seq.)

Properties listed, or formally designated eligible for listing, on the NRHP are automatically listed on the CRHR as are State Historical Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

b. California Environmental Quality Act

For the purposes of CEQA, a significant historical resource is one that qualifies for the CRHR or is listed in a local historic register or deemed significant in an historical resources survey, as provided under Section 5025.1(g) of the Public Resources Code. A resource that is not listed in or is not determined to be eligible for listing in the CRHR, is not included in a local register or historic

resources, or is not deemed significant in an historical resources survey may nonetheless be deemed significant by a CEQA lead agency.

As indicated above, the California criteria (State CEQA Guidelines Section 15065.5) for the registration of significant architectural, archaeological, and historical resources on the CRHR are nearly identical to those for the NRHP. Furthermore, CEQA Section 21083.2(g) defines the criteria for determining the significance of archaeological resources. These criteria include definitions for a "unique" resource, based on its:

- Containing information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Having a special and particular quality such as being the oldest or best available example of its type.
- Being directly associated with a scientifically recognized important prehistoric or historic event or person.

c. Native American Burials (Public Resources Code Section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and designates the NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to a year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

4.4.2.3 Local

a. City of San Diego Municipal Code: Historical Resources Regulations

In January 2000, the City's Historical Resources Regulations (Regulations), part of the SDMC (Chapter 14, Article 3, Division 2: Purpose of Historical Resources Regulations or Sections 143.0201-143.0280), were adopted, providing a balance between sound historic preservation principles and the rights of private property owners. The Regulations have been developed to implement applicable local, state, and federal policies and mandates. Included in these are the City's General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966. Historical resources, in the context of the City's Regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These are usually over 45 years old, and they may have been altered or still be in use.

Historic Resources Guidelines are incorporated in the City's Land Development Code by reference. These Guidelines set up a Development Review Process to review projects in the City. This process is composed of two aspects: the implementation of the Historical Resources Regulations and the determination of impacts and mitigation under CEQA.

Compliance with the Historical Resources Regulations begins with the determination of the need for a site-specific survey for a project. Section 143.0212(b) of the Regulations requires that historical resource sensitivity maps be used to identify properties in the City that have a probability of containing archaeological sites. These maps are based on records maintained by the South Coastal Information Center of the California Historic Resources Information System and San Diego Museum of Man, as well as site-specific information in the City's files. If records show an archaeological site exists on or immediately adjacent to a subject property, the City shall require a survey. In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known resource is recorded on the parcel or within a one-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. A historic property (built environment) survey can be required on a project if the properties are over 45 years old and appear to have integrity of setting, design, materials, workmanship, feeling, and association.

Section 143.0212(d) of the Regulations states that if a property-specific survey is required, it shall be conducted according to the Guidelines criteria. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located.

b. Historical Resources Register

The City provides a broader set of criteria for eligibility for the City's Historical Resources Register. As stated in the City's Historical Resources Guidelines, "Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated as historic by the City of San Diego Historical Resources Board if it meets any of the following criteria:"

- Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
- Is identified with persons or events significant in local, State, or national history;
- Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;
- Is listed or has been determined eligible by National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office (SHPO) for listing on the State Register of Historical Resources; or

Is a finite group of resources related to one another in a clearly distinguishable way or is a
geographically definable area or neighborhood containing improvements which have a
special character, historical interest, or aesthetic value or which represent one or more
architectural periods or styles in the history and development of the City.

If a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register, or not deemed significant in a historical resource survey, City criteria states that it may nonetheless be historically significant.

c. General Plan Historic Preservation Element

The Historic Preservation Element of the General Plan provides guidance on archaeological and historic site preservation in San Diego, including the roles and responsibilities of the Historical Resources Board (HRB), the status of cultural resource surveys, the Mills Act, conservation easements, and other public preservation incentives and strategies. A discussion of criteria used by the HRB to designate landmarks is included, as is a list of recommended steps to strengthen historic preservation in San Diego. The Element sets a series of goals for the City for the preservation of historic resources, and the first of these goals is to preserve significant historical resources. These goals are realized through implementation of policies that encourage the identification and preservation of historical resources.

City General Plan Policies HP-A.1 through HP-A.5 are associated with the overall identification and preservation of historical resources. This includes policies to provide for comprehensive historic resource planning and integration of such plans within City land use plans. These policies also focus on coordinated planning and preservation of tribal resources, promoting the relationship with Kumeyaay/Diegueño tribes. Historic Preservation policies HP-B.1 through HP-B.4 address the benefits of historical preservation planning and the need for incentivizing maintenance, restoration, and rehabilitation of designated historical resources.

4.4.3 Significance Determination Thresholds

Federal, state, and local criteria have been established for the determination of historical resource significance. The following criteria are used by the City of San Diego to determine significance under CEQA related to cultural resources:

1. National Register of Historic Places

The National Register criteria, contained in National Register Bulletin 16 (U.S. Department of the Interior 1986:1), state that: [T]he quality of significance in American history, architecture, archaeology, engineering and culture is present in districts, sites, buildings, structures and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association, and;

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction; or that represent the work of a master; or that possess high artistic values; or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That has yielded, or may be likely to yield information important in prehistory or history.

Criteria Considerations Exceptions: ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years will not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. A property achieving significance within the past 50 years, if it is of exceptional importance.

2. CEQA

For the purposes of CEQA, a significant historic resource is one which qualifies for the California Register of Historical Resources or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code. A resource that is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historic

resources, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA. The City's determination of significance of impacts on historical and unique archaeological resources is based on the criteria found in Section 15064.5 of the State CEQA Guidelines.

3. City of San Diego General Plan

Significance criteria as outlined in the Progress Guide and General Plan reflect a broad definition of historical, architectural and cultural importance; a perspective of local, rather than state or national significance; and the belief that all aspects of history are potentially of equal importance.

4. City of San Diego Historical Resources Register

Any improvement, building, structure, sign, interior element and fixture, site, place, district, area or object may be designated as historic by the City of San Diego Historical Resources Board if it meets any of the following criteria:

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

5. City of San Diego CEQA Significance

As stated above, if a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register, or not deemed significant in a historical resource survey, it may nonetheless be historically significant. The significance of an historical resource is based on the potential for the resource to meet one or more of the criteria presented above, including the potential to address important research questions as documented in a site specific technical report prepared as part of the environmental review

process. Research priorities for the prehistoric, ethnohistoric and historic periods of San Diego history are discussed in Appendix A (San Diego History) to the City's *Historical Resources Guidelines* and should be used in the determination of historical significance. As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA:

An archaeological site must consist of at least three associated artifacts/ecofacts (within a 40 square meter area) or a single feature. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. (Testing is required to document the absence of subsurface deposit.) Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site, including site size, type and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance. The determination of significance for historic buildings, structures, objects and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity. A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious, social or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population.

6. Non-Significant Resource Types

Isolates consist of less than three artifacts/ecofacts within a 40-square-meter area. Sparse Lithic Scatters are identified and evaluated based on criteria from the Office of Historic Preservation's "California Archaeological Resource Identification and Data Acquisition Program; Sparse Lithic Scatters". Isolated Bedrock Milling Stations are defined as having no associated site within a 40-meter radius and lacking a subsurface component. Shellfish Processing Sites are defined as containing a minimal amount of lithics (i.e., less than five or six) and no subsurface deposit. Historic buildings, structures, objects, and landscapes are generally not significant if they are less than 45 years old. A non-significant building or structure located within an historic district is by definition not significant. Resources found to be non-significant as the result of a survey and assessment will require no further work beyond documentation of the resources (including site records) and inclusion in the survey and assessment report.

4.4.4 Issue 1: Prehistoric/Historic Resources

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

4.4.4.1 Impacts

The analysis of impacts under issue question 1 addresses Significant Determination Thresholds 1 through 5 as detailed in Section 4.4.3, above.

a. Historic Resources

San Diego Municipal Code Section 143.0212 requires City staff 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. A site visit, record search, and photo survey was conducted of the permanent buildings on the project site as a part of the initial historical resource review conducted by the City (see Appendix C). City staff reviewed the historic information and determined that the property does not meet the local designation criteria as an individually significant resource under adopted Historical Resources Board criteria (Significance Determination Threshold 4). None of the buildings are identified with any significant local, state, or national person or event and they do not reflect any special elements of the City or community (Significance Determination Thresholds 1, 2, 3, and 4). The construction lacks distinctive characteristics and style and is not associated with any notable builder, designer, architect, or craftsman (Significance Determination Thresholds 1, 2, and 4).

b. Prehistoric/Archaeological Resources

The entire project site is developed and has been subject to prior disturbance and placement of fill.

However, according to the City's Historical Resources Sensitivity Maps the project area is located within an area identified as having a high sensitivity level for archaeological resources. A record search of the California Historic Resources Information System (CHRIS) digital database was reviewed to determine the presence or absence of potential resources within the project site. No recorded sites were identified within the project boundaries, but several previously recorded historic and prehistoric sites have been identified in the project vicinity. In fact, a very well-known prehistoric Native American village is located west of the project site. Given the fact that many archaeological sites have been found throughout the area, resources could have been buried beneath the level of disturbance.

Based on this information, there is a potential for buried cultural resources to be impacted through implementation of the project. Therefore, there is the potential for ground-disturbing activities to result in impacts to unknown historical resources (archaeology) (Significance Determination Threshold 5).

4.4.4.2 Significance of Impacts

Based on the significant thresholds identified above, implementation of the project would not result in impacts to historic resources; however, a potentially significant impact to prehistoric/archaeological resources has been identified with the implementation of the proposed project. Archaeological and Native American monitoring is incorporated as a mitigation measure in response to the request of the tribes to ensure impacts to unknown, potentially buried prehistoric resources would be avoided.

4.4.4.3 Mitigation, Monitoring, and Reporting

Implementation of mitigation measure CUL-1 would require archaeological and Native American monitoring during ground disturbance and would be implemented during project grading, as detailed below. This mitigation measure also applies to Tribal Cultural Resources, which are discussed separately in Section 4.5 of this EIR.

CUL-1: Archaeological and Native American Monitoring

I. Prior to Permit Issuance

A. Entitlements Plan Check

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

B. Letters of Qualification have been submitted to ADD

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

II. Prior to Start of Construction

A. Verification of Records Search

- 1. The PI shall provide verification to MMC that a site specific records search (¼-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
- 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
- 3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼-mile radius.

B. PI Shall Attend Precon Meetings

- Prior to beginning any work that requires monitoring; the Applicant shall arrange a
 Precon Meeting that shall include the PI, Native American consultant/monitor (where
 Native American resources may be impacted), Construction Manager (CM) and/or
 Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and
 MMC. The qualified archaeologist and Native American monitor shall attend any
 grading/excavation related precon meetings to make comments and/or suggestions
 concerning the archaeological monitoring program with the CM and/or Grading
 Contractor.
 - a. If the PI is unable to attend the precon meeting, the applicant shall schedule a focused precon meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

- a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
- b. The AME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

- a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall

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

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

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

B. Discovery Notification Process

- In the event of a discovery, the archaeological monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
- 2. The monitor shall immediately notify the PI (unless monitor is the PI) of the discovery.

- 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
- 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

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

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported offsite until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.3(e), the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) shall be undertaken:

A. Notification

- 1. Archaeological monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the monitor is not qualified as a PI. MMC will notify the appropriate senior planner in the Environmental Analysis Section of the Development Services Department to assist with the discovery notification process.
- 2. The PI shall notify the medical examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

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

C. If human remains ARE determined to be Native American

- 1. The medical examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the medical examiner can make this call.
- 2. NAHC will immediately identify the person or persons determined to be the most likely descendent (MLD) and provide contact information.
- 3. The MLD will contact the PI within 24 hours or sooner after the medical examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.3(e), the California Public Resources and Health & Safety Codes.
- 4. The MLD will have 48 hours <u>after inspection of the site</u> to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
- 5. Disposition of Native American human remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR
 - The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with Public Resources Code 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN,
 - c. In order to protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement on the site;
 - (3) Record a document with the County.
 - d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional

conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures, the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are NOT Native American

- 1. The PI shall contact the medical examiner and notify them of the historic era context of the burial.
- 2. The medical examiner will determine the appropriate course of action with the PI and City staff (Public Resources Code 5097.98).
- 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, Environmental Analysis Section, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

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

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

b. Discoveries

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

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV - Discovery of Human Remains shall be followed.

- d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night and/or weekend work becomes necessary during the course of construction:
 - 1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
 - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation
 - The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms—DPR 523A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's HRG, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
 - 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 - 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
 - 4. MMC shall provide written verification to the PI of the approved report.
 - 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

- 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged.
- 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
- 3. The cost for curation is the responsibility of the property owner.
- C. Curation of artifacts: Accession Agreement and Acceptance Verification
 - 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
 - 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
 - 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)

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

4.4.4.4 Significance of Impacts after Mitigation

Implementation of the mitigation measure outlined above would reduce potential impacts related to potentially buried prehistoric resources to less than significant.

4.4.5 Issue 2: Religious/Sacred Uses

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

4.4.5.1 Impacts

The analysis of impacts under issue question 2 addresses Significant Determination Threshold 5 as detailed in Section 4.4.3, above.

No religious or sacred uses were identified on-site or within the immediate vicinity of the project site as a result of Native American consultation. Therefore, project implementation would have a less than significant impact related to religious and sacred uses.

4.4.5.2 Significance of Impacts

No religious or sacred uses have been identified within the project area; thus, impacts would be less than significant.

4.4.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.4.6 Issue 3: Human Remains

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

4.4.6.1 Impacts

The analysis of impacts under issue question 3 addresses Significant Determination Threshold 5 as detailed in Section 4.4.3, above.

No known burial sites or cemeteries exist within the vicinity of the project site and it is not expected that human remains would be disturbed as a result of the project. In the unlikely event of the discovery of human remains during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) shall be undertaken, as required in Section 4.4.4.3, mitigation measure CUL-1 above.

4.4.6.2 Significance of Impacts

Although it is not expected that human remains would be located on the project site, there is a potential for buried human remains to be disturbed by grading and construction activities. Therefore, impacts associated with human remains would be potentially significant.

4.4.6.3 Mitigation, Monitoring, and Reporting

The project would implement mitigation measure CUL-1, which would require archaeological and Native American monitoring during ground disturbance and would be implemented during project grading. Implementation of the mitigation measure outlined above would reduce potential impacts related to human remains to less than significant.

4.5 Tribal Cultural Resources

This section evaluates potential tribal cultural resources impacts associated with the project. The analysis is based in part on the California Historic Resources Information System (CHRIS) digital database search and consultation with California Native American tribes traditionally and culturally affiliated with the project area who have requested consultation pursuant to Public Resources Code Section 21080.3.1.

4.5.1 Existing Conditions

No tribal cultural resources are known to exist on the project site. Refer to Section 4.4.1 for a discussion of existing conditions related to cultural resources and the history of Native Americans in the project area.

4.5.2 Regulatory Framework

4.5.2.1 Federal

a. United States Code, Title 25, Sections 3001 et seq.

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

4.5.2.2 State

a. California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

b. California Public Resources Code, Sections 5020–5029.5

This code continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.

c. Public Resources Code Sections 5097-5097.994

Native American Historic Resource Protection Act; Archaeological, Paleontological, and Historical Sites; Native American Historical, Cultural, and Sacred Sites (Public Resources Code Section 5097-5097.994) specifies the procedures to be followed in the event of the unexpected discovery of human remains on non-federal public lands. California Public Resources Code 5097.9 states that no public agency or private party on public property shall "interfere with the free expression or exercise of Native American Religion." The code further states that:

No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine . . . except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, expect for parklands larger than 100 acres.

d. California Public Resources Code, Section 5024.1

The California Register of Historical Resources (CRHR) is the state version of the National Register of Historic Places (NRHP) program. The CRHR was enacted in 1992 and became official on January 1, 1993. The CRHR was established to serve as an authoritative guide to the state's significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. CEQA identifies a historic resource as a property that is listed on—or eligible for listing on—the NRHP, CRHR, or local registers. NRHP-listed properties are automatically included on the CRHR.

The CRHR also includes properties that: have been formally determined eligible for listing or are listed in the NRHP; are registered State Historical Landmark Number 770 and above; are points of historical interest that have been reviewed and recommended to the State Historical Resources Commission for listing; or are City- and County-designated landmarks or districts (if criteria for designation are determined by Office of Historic Preservation to be consistent with CRHR criteria).

e. Assembly Bill 52

Assembly Bill 52 (AB 52), the Native American Historic Resource Protection Act, sets forth a proactive approach intended to reduce the potential for delay and conflicts between Native American and development interests. Projects subject to AB 52 are those that file a notice of preparation for an EIR or notice of intent to adopt a negative or mitigated negative declaration on or after July 1, 2016. AB 52 adds tribal cultural resources to the specific cultural resources protected under CEQA. Under AB 52, a tribal cultural resource is defined as a site, feature, place, cultural landscape (must be

geographically defined in terms of size and scope), sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register, or included in a local register of historical resources. A Native American tribe or the lead agency, supported by substantial evidence, may choose at its discretion to treat a resource as a tribal cultural resource. AB 52 also mandates lead agencies to consult with tribes, if requested by the tribe, and sets the principles for conducting and concluding consultation.

4.5.2.3 Local

a. City of San Diego General Plan

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

4.5.3 Significance Determination Thresholds

Impacts related to tribal cultural resources would be significant if the project would result in:

- 1. 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
 - b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.5.4 Issue 1: 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
- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

4.5.4.1 Impacts

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

The project area is located within an area identified as sensitive on the City of San Diego Historical Resources Sensitivity Maps; furthermore, there are recorded cultural resources within a one-mile buffer of the site. Therefore, qualified City staff conducted a records search of the CHRIS digital database; although the search identified that no previously recorded resources are located within the project boundaries, the search confirmed several previously recorded historic and prehistoric sites in the project vicinity (see Section 4.4.1.1.b).

The project site has not been selected as a site recommended for historic designation. Furthermore, the project site is not identified on any of the historic resource lists/databases—the National Register of Historic Places and the California State Historical Landmarks, Points of Historical Interest, and Register of Historic Places. Although the City as the lead agency has not identified tribal cultural resources within the area of potential effect, the area is considered sensitive for potential tribal cultural resources (buried cultural resources and/or subsurface deposits). Therefore, there is the potential for inadvertent discovery of a resources that could be impacted by project implementation due to the existing conditions and anticipated grading activities and excavation depths proposed.

In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego initiated the lipay Nation of Santa Isabel and the Jamul Indian Village, both traditionally and culturally affiliated with the project area. Formal notification letters were sent via certified mail and electronic mail on July 6, 2017. Both Native American tribes responded within the 30-day formal notification period requesting consultation. During the consultation process, the Native American tribes requested information on the results of the CHRIS digital database and copies of the

archaeological investigation prepared in conjunction with the project. Consultation took place on July 14, 2017. Both Native American tribes concurred with the City's determination that potential impacts could result to tribal cultural resources. On July 20, 2017, the consultation process was concluded by both the lipay Nation of Santa Isabel and Jamul Indian Village. As previously identified, although tribal cultural resources have not been identified within the project site, the area is considered sensitive for potential tribal cultural resource. Therefore, there is the potential for impacts to occur.

4.5.4.2 Significance of Impacts

The project site has not been selected as a site recommended for historic designation. Furthermore, the project site is not identified on any of the historic resource lists/databases—the National Register of Historic Places and the California State Historical Landmarks, Points of Historical Interest, and Register of Historic Places.

The project area is located within an area identified as sensitive on the City of San Diego Historical Resources Sensitivity Maps. In addition, the lipay Nation of Santa Isabel and the Jamul Indian Village tribes are affiliated traditionally and culturally with the project area. The area is considered sensitive for potential tribal cultural resource (buried cultural resources and/or subsurface deposits). Therefore, there is the potential for inadvertent discovery of a resource that could be impacted by project implementation. Impacts would be considered significant.

4.5.4.3 Mitigation, Monitoring, and Reporting

Implementation of mitigation measure CUL-1, which requires Native American monitoring during ground disturbance activities consistent with the results of tribal consultation, would reduce impacts to a level less than significant. Refer to Section 4.4.4.3.

4.5.4.4 Significance of Impacts after Mitigation

Implementation of mitigation measure CUL-1 would reduce impacts associated with tribal cultural resources to less than significant.

4.6 Traffic Circulation

The following traffic discussion is summarized from the Transportation Impact Analysis (TIA) prepared by Linscott, Law &0020Greenspan Engineers dated April 30, 2018 (Appendix D). Project impacts were analyzed for the existing, near-term, and year 2035 (long-term) scenarios.

4.6.1 Existing Conditions

4.6.1.1 Level of Service

Level of Service (LOS) is the term used to denote the different operating conditions that occur on a given roadway segment or intersection under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis taking into account factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety. LOS provides an index to the operational qualities of a roadway segment or an intersection. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. LOS designation is reported differently for signalized and unsignalized intersections, as well as for roadway segments.

4.6.1.2 Existing Circulation System

Figure 4.6-1 shows the existing roadway conditions for the project study area. Brief descriptions of the area's roadways are listed below.

Morena Boulevard is a north-south running roadway along the southerly and westerly project frontage. Along the southerly project frontage, it is classified on the Linda Vista Community Plan and built as a three-lane collector from its split with West Morena Boulevard (approximately one mile south of the project site, near Friars Road) up to Tecolote Road providing one lane in each direction divided by a two-way left-turn lane (TWLTL). North of Tecolote Road, it is classified in the Clairemont Mesa Community Plan (CMCP) as a two-lane collector (with TWLTL) to West Morena Boulevard (north). It is currently built as a two-lane undivided roadway. No bike lanes are provided, and curbside parking is generally permitted in both directions.

In the Linda Vista Community Plan (LVCP), Morena Boulevard from Tecolote Road to Knoxville Street is classified as a four-lane collector. This portion of the roadway is currently built as a four-lane undivided roadway with a substandard paved width. Curbside parking is not permitted, bus stops are located along the roadway, and no bike lanes are provided. The posted speed limit in the study area ranges between 30-35 miles per hour (mph).

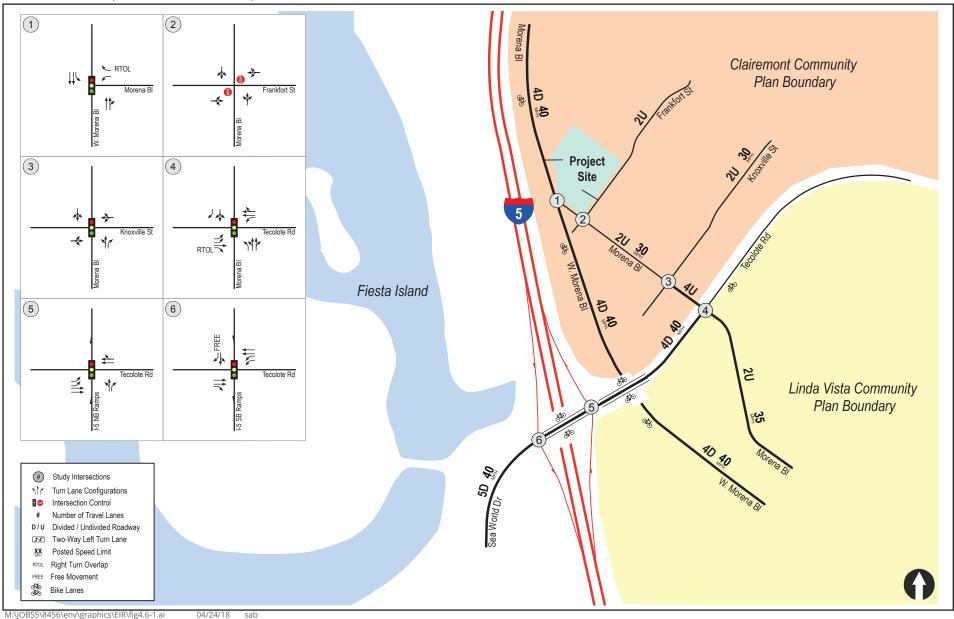


FIGURE 4.6-1 Existing Roadway Conditions

Along the westerly project frontage, Morena Boulevard is classified in the Linda Vista Community Plan as a five-lane major roadway from its intersection with West Morena Boulevard (south) to the Tecolote Road overpass. North of Tecolote Road, it is classified as a four-lane major roadway in the Clairemont Mesa Community Plan and the Linda Vista Community Plan. A Class II bike lane is provided in the southbound direction. Curbside parking is permitted in the northbound direction.

West Morena Boulevard is currently constructed as a four-lane divided roadway in the project vicinity. Curbside parking is permitted intermittently, bus stops are located along the roadway, and a Class II bike lane is provided in the southbound direction. Curbside parking is also permitted in the northbound direction. The posted speed limit in the study area is 40 mph.

Tecolote Road is an east-west running roadway. East of Interstate 5 (I-5), Tecolote Road is classified in the LVCP and built primarily as a four-lane major roadway to its terminus approaching Tecolote Recreational Park, approximately 0.40 mile east of Morena Boulevard. Curbside parking is prohibited between the I-5 southbound ramps and Morena Boulevard, and Class II bike lanes are provided in both directions along this segment as well. East of Morena Boulevard, a Class II bike lane is provided in the eastbound direction. Curbside parking is permitted in both directions along Tecolote Road east of Morena Boulevard. The posted speed limit in the vicinity is 40 mph.

Sea World Drive (west of I-5) is a north-south running roadway and is classified in the Linda Vista Community Plan and built as a five-lane primary arterial immediately west of Interstate 5. Curbside parking is prohibited in the study area, and neither bus stops nor bike lanes are provided east of East Mission Bay Drive. The posted speed limit in the vicinity is 40 mph.

4.6.1.3 Existing Traffic Volumes

a. Intersections

Table 4.6-1 shows the existing AM and PM peak hour intersection traffic data. As shown, all intersections currently operate at LOS D or better during the AM and PM peak hour periods.

	Table 4.6-1									
	Existing Intersection Operations									
		Control Peak Existing								
	Intersection	Type	Hour	Delay ^a	LOS ^b					
1	Marana Dhid Mast Marana Dhid	Cianalizad	AM	13.8	В					
1.	Morena Blvd./West Morena Blvd.	Signalized	PM	10.3	В					
2	Marana Died /Frankfort Ctroot	MCCCC	AM	14.0	В					
۷.	2. Morena Blvd./Frankfort Street	MSSC ^c	PM	15.1	C					
2	Marana Dhid //marailla Ctroot	Cianalizad	AM	13.0	В					
3.	Morena Blvd./Knoxville Street	Signalized	PM	7.7	Α					
4	Marana Divid /Tasalata Dand	Cianalizad	AM	32.6	С					
4.	Morena Blvd./Tecolote Road	Signalized	PM	29.6	C					
_	Tableta Danidii END Dania	C:l:l	AM	42.0	D					
5.	Tecolote Road/I-5 NB Ramps	Signalized	PM	48.7	D					
_	Can Marild Drive / L. C.D. Dorono	C:l:l	AM	22.1	С					
6.	Sea World Drive/I-5 SB Ramps	Signalized	Peak Existing e Hour Delay ^a LO zed AM 13.8 B PM 10.3 B AM 14.0 B PM 15.1 C zed AM 13.0 B PM 7.7 A zed AM 32.6 C PM 29.6 C zed AM 42.0 D zed AM 22.1 C	В						

^aAverage delay expressed in seconds per vehicle

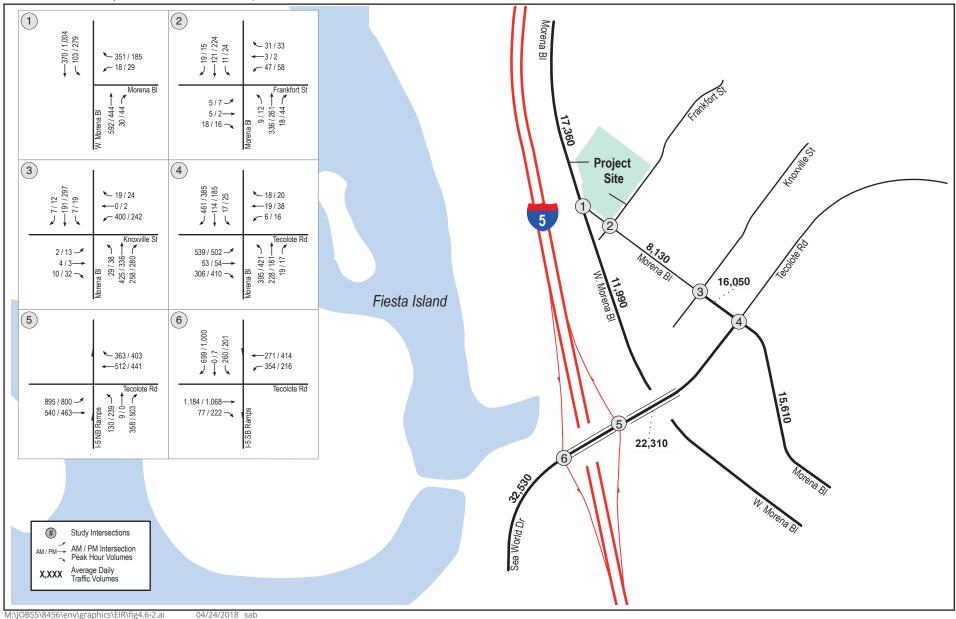
b. Street Segments

Figure 4.6-2 shows existing traffic volumes, including AM/PM peak hour turning movements and average daily traffic (ADT) volumes on street segments within the study area. Table 4.6-2 presents the existing street segment ADT, LOS, and volume to capacity (V/C) ratios. As shown, all street segments operate at LOS C or better, except for the following:

- Segment #1. Morena Boulevard: Frankfort Street to Knoxville Street LOS F
- Segment #2. Morena Boulevard: Knoxville Street to Tecolote Road LOS F
- Segment #3. Morena Boulevard: Tecolote Road to Viola Street LOS F

^bLOS = level of service

^cMSSC = Minor Street Stop-Controlled intersection; worst movement delay reported



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FIGURE 4.6-2 Existing Traffic Volumes

	Table 4.6-2				
Existing S	treet Segment O	perations			
	Currently	Capacity			
Street Segment	Built As	(LOS E) ^a	ADT^b	LOS ^c	V/C ^d
Morena Blvd.					
1. Asher Street to W. Morena	4-Lane Major	40,000	17,360	В	0.434
Boulevard					
2. Frankfort Street to Knoxville Street	2-Lane	8,000	8,130	F	1.016
	Collector				
3. Knoxville Street to Tecolote Road	2-Lane	15,000	16,050	F	1.070
	Collector				
4. Tecolote Road to Viola Street	3-Lane	15,000	15,610	F	1.041
	Collector				
West Morena Blvd					
5. Morena Blvd. to Sea World Drive	4-Lane Major	40,000	11,990	Α	0.300
Overcrossing					
Tecolote Road					
6. I-5 NB Ramps to Morena Blvd.	4-Lane Major	40,000	22,310	С	0.558
Sea World Drive					
7. E. Mission Bay Dr. to I-5 SB Ramps	5-Lane Prime	55,000	32,530	С	0.591

^aCapacities based on City of San Diego Roadway Classification & LOS table (see Appendix D).

4.6.1.4 Existing Trip Generation

The existing Coastal Trailer Villa development is currently composed of a 90-space recreational vehicle (RV) park. Trip generation for the existing development was calculated using a hybrid rate based on the Institute of Transportation Engineers (ITE) Trip Generation, 9th Edition, (use 416, "Campground/Recreational Vehicle Park"), as the City of San Diego (City) does not publish a trip generation rate for a comparable land use. A hybrid rate was used because the RV park does not function the same as the campground/RV park use described in the ITE rates. The RV park allows stays up to six months and does not provide on-site amenities typical of the campground/RV park use described in the ITE rates, such as a swimming pool, on-site store, or immediate proximity to recreation (such as a lake, river, or hiking trails). Additionally, there are six full-time dwelling units (two duplexes and two single-family dwelling units) on the site, as well as seven full-time RV residents. Thus, some of the existing trips on the site are more similar to residential trips, which generated higher trip rates. The existing trip generation calculation assumes that 50 percent (i.e., 45 units) of the total 90 RV spaces were occupied at the time of existing counts. Using the ITE hybrid rates, the existing land use was determined to conservatively generate 104 ADT with 9 trips during the AM peak hour (3 inbound/6 outbound) and 12 trips during the PM peak hour (8 inbound/4 outbound).

^bADT = average daily traffic volumes

^cLOS = level of service

^dV/C = volume to capacity

4.6.1.5 Existing Transit Conditions

Bus Service: A bus stop is located immediately adjacent to the project site at the intersection of Morena Boulevard and Frankfort Street. This bus stop is served by Route 105 (Old Town – University Town Center [UTC]), which runs between the Old Town Transit Center and the UTC Transit Center primarily via Morena Boulevard and Clairemont Drive. Route 105 provides a direct connection to the San Diego Trolley Blue and Green lines at the Old Town Transit Center. Weekday service runs from shortly after 5:00 a.m. to around 10:00 p.m. at approximately 30-minute headways, reducing to hourly headways in the evening hours. Saturday and Sunday service runs from around 6:00 a.m. to 8:30 p.m. with hourly headways all day.

Trolley Extension: The Mid-Coast Corridor Transit Project would extend Trolley Blue Line service from the Old Town Transit Center to major destinations in the north including University of California, San Diego and Westfield UTC. The Blue Line extension route begins just north of the Old Town Transit Center and travels alongside I-5 within the existing right-of-way of the Los Angeles-San Diego-San Luis Obispo railroad. The Blue Line extension would serve nine new stations, including the proposed Tecolote Trolley/Light Rail Transit station, which would be located in close proximity to the project. The Mid-Coast Trolley extension is under construction and is anticipated to begin service in 2021.

4.6.2 Regulatory Framework

4.6.2.1 State Regulations

a. California Department of Transportation

The California Department of Transportation (Caltrans) is the primary state agency responsible for transportation issues. One of its duties is the construction and maintenance of the state highway system. Caltrans has established standards for street traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities but may influence traffic flow and levels of services at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects. In addition, Caltrans must review proposals to signalize any freeway ramp interchanges through their Intersection Control Evaluation process (Caltrans Traffic Operations Policy Directive #13-01).

4.6.2.2 Local Regulations

a. San Diego Forward: The Regional Plan

See Section 4.1, Land Use for a complete discussion of San Diego Forward: The Regional Plan (Regional Plan). Overall, the Regional Plan provides policies and direction for managing the region's growth through the creation of transportation centers located within identified smart growth opportunity areas. The project site is located within a Transit Priority Area and within an

Existing/Planned Mixed-Use Transit Corridor (SD CM-7), a Smart Growth Opportunity Area identified on the San Diego Association of Governments (SANDAG) Smart Growth Concept Map (SANDAG 2016a). Mixed-Use Transit Corridors are characterized as having high-frequency local bus or streetcar/shuttle service. SANDAG identifies this area as a Mixed-Use Transit Corridor place type due to the existing high-frequency local bus service (Route 50), the planned trolley (Route 510 – planned Mid Coast Trolley Extension), and the planned high-frequency local bus service (Route 105) that is planned to be phased in by 2020. SANDAG identifies a target minimum density of 25 dwelling units per acre for this opportunity area.

b. City of San Diego General Plan

The Mobility Element of the City of San Diego General Plan defines the policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network." The main goals of the Mobility Element pertain to walkable communities, transit first, street and freeway system, intelligent transportation systems (ITS), Transportation Demand Management (TDM), bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing.

Table 4.1-1 provides a discussion of the General Plan Mobility Element goals and objectives applicable to the project, including creating walkable communities, enhancing use of public transit, enhancing bicycle and pedestrian road network, and ensuring adequate parking.

c. Clairemont Mesa Community Plan Transportation Element

The primary goal for transportation as stated in the CMCP is to "[P]rovide a safe and efficient transportation system that maximizes access to community activity centers and to destinations within the City, minimizing adverse environmental effects" (CMCP page 12). Table 4.1-1 provides a discussion of the transportation objectives applicable to the project, including avoiding impacts to the street system, enhancing bicycle and pedestrian systems, and encouraging use of public transportation.

d. Morena Boulevard Station Area Planning Study

As briefly discussed in Section 4.1.1, the Morena Boulevard Station Area Planning Study (MBAP) addresses the future form of the Morena Boulevard corridor as that community changes both through expected urban development and the introduction of the Mid-Coast Light Rail Transit Trolley extension. The MBAP study area is bounded by Gesner Street on the north, Friars Road on the south, I-5 on the west, and various streets on the east which generally demarcate the boundary between commercial and single-family land uses. The project's transportation study area is fully within the MBAP study area with the exception of the I-5/Tecolote Road/Sea World Drive freeway interchange. The MBAP Recommended Mobility Plan focuses on improvements to Morena Boulevard and West Morena Boulevard, and identifies new street connections and reorganization of roadway conditions as detailed in Section 4.6.4.1.c, Year 2035 Conditions. This study was prepared to inform development of the Morena Boulevard Specific Plan.

4.6.3 Significance Determination Thresholds

The following thresholds have been established by the City of San Diego to determine significance under California Environmental Quality Act related to traffic impacts:

- 1. If any intersection or roadway segment affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the thresholds shown in the table below (Table 4.6-3);
- 2. At any ramp meter location with delays above 15 minutes, the impact would be significant if the project exceeds the thresholds shown in Table 4.6-3.
- 3. If a project would add a substantial amount of traffic as shown in Table 4.6-3 to a congested freeway segment, interchange, or ramp, the impact may be significant.
- 4. If a project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g., poor sight distance, proposed driveway onto an access-restricted roadway), the impact would be significant;
- 5. If a project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, the impact would be significant if the proposed roadway would not properly align with other existing or planned roadways; or
- 6. If a project would result in a substantial restriction in access to publicly or privately owned land, the impact would be significant.
- 7. If the project's parking shortfall or displacement of existing parking would substantially affect the availability of parking in an adjacent residential area, including the availability of public parking, the impact would be significant.
- 8. If the project would result in a parking deficiency that would severely impede the accessibility of a public facility, such as a park or beach.

			Table 4.0	6-3					
	Significance Thresholds								
Allowable Increase Due to Project Impacts ^a									
Level of Service	Fre	Freeways		Segments	Intersections	Ramp Metering ^b			
with Project ^a	V/C	Speed	V/C	Speed	Delay (sec.)	Delay (min.)			
E	0.010	1.0	0.02	1.0	2.0	2.0			
F	0.005	0.5	0.01	0.5	1.0	1.0			

SOURCE: City of San Diego 2016a; Transportation Impact Analysis (Appendix D).

^aAll LOS measurements are based upon Highway Capacity Manual procedures for peak-hour conditions. However, V/C ratios for roadway segments are estimated on an ADT/24-hour traffic volume basis (using Table 2 of the City's Traffic Impact Study Manual). The acceptable LOS for freeways, roadways, and intersections is generally "D" ("C" for undeveloped locations). For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

^bThe allowable increase in delay at a ramp meter with more than 15 minutes delay and freeway LOS E is 2 minutes. The allowable increase in delay at a ramp meter with more than 15 minutes delay and freeway LOS F is 1 minute. No ramp meters were analyzed in this report since none of the study area freeway onramps are currently metered.

Notes:

Delay = average control delay per vehicle measured in seconds for intersections or minutes for ramp meters LOS = level of service

V/C = volume-to-capacity ratio

Speed = arterial speed measured in miles per hour

Significant impacts are considered either "direct" or "cumulative." According to the City's Significance Determination Thresholds (2016a):

Direct traffic impacts are those projected to occur at the time a proposed development becomes operational, including other developments not presently operational but which are anticipated to be operational at that time (near term).

Cumulative traffic impacts are those projected to occur at some point after a proposed development becomes operational, such as during subsequent phases of a project and when additional proposed developments in the area become operational (short-term cumulative) or when the affected community plan area reaches full planned build out (long-term cumulative).

It is possible that a project's near term (direct) impacts may be reduced in the long term, as future projects develop and provide additional roadway improvements (for instance, through implementation of traffic phasing plans). In such a case, the project may have direct impacts but not contribute considerably to a cumulative impact.

For intersections and roadway segments affected by a project, level of service (LOS) D or better is considered acceptable under both direct and cumulative conditions.

If the project exceeds the thresholds shown in Table 4.6-3, then the project may be considered to have a significant "direct" or "cumulative" project impact. A significant impact can also occur if a

project causes the LOS to degrade from D to E, even if the allowable increases in Table 4.6-3 are not exceeded.

4.6.3.1 Methodologies

a. Intersections

Signalized intersections were analyzed under weekday 7:00-9:00 a.m. and 4:00-6:00 p.m. peak hour conditions. Average vehicle delay was determined utilizing the methodology found in Chapter 18 of the 2010 Highway Capacity Manual (HCM), with the assistance of the Synchro (version 9) computer software. The delay values (represented in seconds) were qualified with a corresponding intersection LOS. City and Caltrans location-specific signal timing information such as minimum greens, cycle lengths, phasing, and splits for the freeway interchanges, where available, and real-time peak hour field observations were included in the analysis.

Unsignalized intersections were analyzed under weekday 7:00-9:00 a.m. and 4:00-6:00 p.m. peak hour conditions. Average vehicle delay and LOS were determined based upon the procedures found in Chapters 19 and 20 of the 2010 HCM, with the assistance of the Synchro (version 9) computer software.

It should be noted that the procedures from the 2000 HCM were used at intersections where the 2010 HCM is limited in its analysis capabilities. For example, the 2010 HCM cannot analyze U-turn movements, nor can it analyze shared thru/left-turn lanes often observed at split phased intersections.

b. Street Segments (Volume to Capacity)

Buildout (ultimate) street segment classifications were taken from the CMCP, LVCP, and the MBAP. Street segment analyses are based upon the comparison of ADTs to a roadway capacity presented in the City's Roadway Classification, Level of Service, and ADT Table. This table provides generalized segment capacities for different street classifications based on factors such as traffic volumes, roadway widths, speed limits, curve radii, parking provisions, etc. The ADT volume for a subject roadway is compared to the table, and a V/C ratio is calculated by dividing the volume by the capacity. Copies of the Community Plan/Area Plan roadway classification maps and the City roadway classification table are provided in the TIA appendices (see Appendix D).

4.6.4 Issue 1: Traffic Generation and Existing Capacity

Would the project result in traffic generation that would cause an intersection, roadway segment, freeway segment, interchange or ramp to operate at LOS E or F under either direct or cumulative conditions and exceed the significance thresholds detailed in Table 4.6-3?

4.6.4.1 Impacts

The analysis of impacts under issue question 1 addresses Significance Determination Thresholds 1, 2, and 3 as detailed in Section 4.6.3. The analysis includes three traffic condition scenarios: Existing Plus Project; Near-Term Plus Project; and Year 2035 Plus Project. It should be noted that freeway segments did not warrant evaluation due to the minimal number of project trips that would be distributed to freeways.

a. Existing Plus Project

The Existing Plus Project condition was analyzed to compare existing traffic conditions without the project to existing traffic conditions with the project. Figure 4.6-3 shows existing AM/PM peak hour turning movements and ADT on street segments within the study area under the Existing Plus Project condition.

Trip generation for the project was calculated using the City's Trip Generation Manual. The proposed 150 multi-family residential units is calculated to generate six trips per dwelling unit, or a gross total of 900 ADT with 72 trips (14 in, 58 out) during the AM peak hour and 81 trips (57 in, 24 out) during the PM peak hour. However, because the existing site is developed with a RV park, there are existing trips generated from the existing land use that can be credited. To be conservative, the existing trip generation assumes only half of the existing RV units are occupied (45 of the 90 units). The existing use was calculated to generate 104 ADT with 9 trips during the AM peak hour (3 inbound/6 outbound) and 12 trips during the PM peak hour (8 inbound/4 outbound). Thus, after subtracting the existing trips, the net project trip generation calculated for the project and used as the basis for the analysis is 796 ADT with 63 trips during the AM peak hour (11 inbound/52 outbound) and 69 trips during the PM peak hour (49 inbound/20 outbound).

The project traffic was distributed based on traffic patterns observed from existing count data and professional engineering judgment. Given the proximity of the project site to I-5, it was estimated that approximately 60 percent of project traffic would be oriented to regional facilities via the I-5/Sea World Drive/Tecolote Road interchange. The remaining 40 percent of project trips were distributed to the local street system, including 10 percent to the west via Sea World Drive, 15 percent to the south via Morena Boulevard and West Morena Boulevard, 10 percent to the north via Morena Boulevard, and 5 percent to the east via Frankfort Street and Knoxville Street.

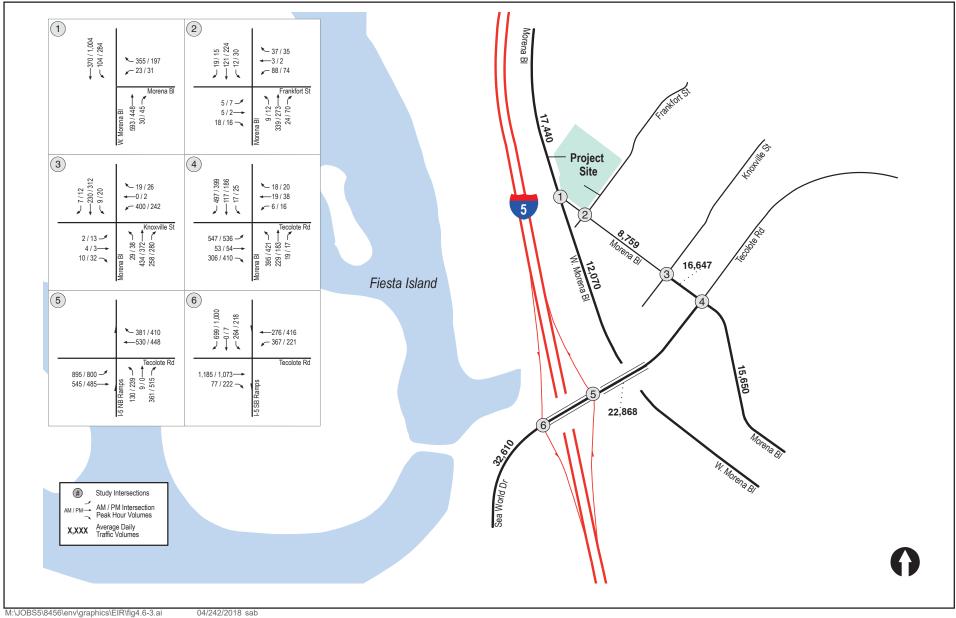


FIGURE 4.6-3 Existing Plus Project Traffic Volumes

Intersections

As shown in Table 4.6-4, with the addition of project traffic, all intersections would continue to operate at LOS D or better. Therefore, impacts to intersections under the Existing Plus Project condition would be less than significant.

Evic	ting Plus F		4.6-4	n Onora	tions			
EXIS	Control	Peak	Exist	ing	Existing -		Delay	
Intersection	Type	Hour	Delay ^a	LOS ^b	Delay ^a	LOS ^b	Δ^{c}	Sig? ^d
1. Morena Blvd./W. Morena Blvd.	Cignal	AM	13.8	В	14.0	В	0.2	No
1. Moreria biva./W. Moreria biva.	Signal	PM	10.3	В	10.6	В	0.3	INO
2. Morena Blvd./Frankfort St.	MSSC ^e	AM	14.0	В	16.1	С	2.1	No
2. Morella bivu./Frankiort St.	IVISSC	PM	15.1	C	16.8	C	1.7	INO
3. Morena Blvd./Knoxville St.	Cignal	AM	13.0	В	13.3	В	0.3	- No
5. Moreria biva./Krioxville St.	Signal	PM	7.7	Α	7.9	Α	0.2	INO
4 Marana Blud /Taralata Bd	Cianal	AM	32.6	С	34.8	С	2.2	No
4. Morena Blvd./Tecolote Rd.	Signal	PM	29.6	С	30.3	С	0.7	No
E Taralata Dd /I E ND Damas	Signal	AM	42.0	D	46.6	D	4.6	
5. Tecolote Rd./I-5 NB Ramps		PM	48.7	D	49.5	D	0.8	No
6 C . W . H.D . # 5 CD D	6 11	AM	22.1	С	22.5	С	0.4	
6. Sea World Dr./I-5 SB Ramps	Signal	PM	19.8	В	20.7	С	0.9	No
^a Average delay expressed in second	ls per vehic	le	9	SIGNALIZ	ED	UNSIG	INALIZED	
^b LOS = level of service				DELAY/L	OS	DEL	AY/LOS	
^c Δ denotes the increase in delay due		: :	Т	HRESHO	LDS	THRE	SHOLDS	
dSig? = Significant impact, yes or no		+ :	D	elay	LOS	Delay	LC)S
eMSSC = Minor Street Stop-Controll	ea miersec	uon;	0.0	≤ 10.0	Α	0.0 ≤ 10	0.0 A	١.
worst movement delay reported				to 20.0	В	10.1 to 1	5.0 E	3
			20.1	to 35.0	C	15.1 to 2	5.0	-
				to 55.0	D	25.1 to 3	5.0)
			55.1	to 80.0	Е	35.1 to 5	0.0 E	
				≥ 80.1	F	≥ 5	0.1 F	

Street Segments

As shown in Table 4.6-5, with the addition of project traffic, all street segments would continue to operate at LOS C or better except for the following:

- Segment #2. Morena Boulevard: Frankfort Street to Knoxville Street LOS F
- Segment #3. Morena Boulevard: Knoxville Street to Tecolote Road LOS F
- Segment #4. Morena Boulevard: Tecolote Road to Viola Street LOS F

These street segments currently operate at LOS F and would continue to operate at LOS F with the addition of project traffic. As shown in Table 4.6-5, the increase in V/C ratio due to project traffic for Segment #4 would be 0.002 which is less than the City's significance threshold of 0.01 for a segment operating at LOS F. With the additional project traffic, segments #2 and #3 would exceed the City's

significance threshold of 0.01 by increasing the V/C ratio by 0.079 and 0.040, respectively. The increase in V/C ratio due to the project on Segment #2 and Segment #3 would result in a significant impact to both segments.

Ex	Table 4.6-5 Existing Plus Project Street Segment Operations									
	Existing	Existing			Exist	ing + Pro	ject			
	Capacity									
Street Segment	(LOS E) ^a	ADT ^b	LOS ^c	V/C ^d	ADT ^b	LOS ^c	V/C ^d	Δ^{e}	Sig? ^f	
Morena Boulevard										
1. Asher Street to W. Morena	40,000	17,360	В	0.434	17,440	В	0.436	0.002	No	
Boulevard	40,000	17,300	ט	0.454	17,440	ם	0.430	0.002	NO	
2. Frankfort Street to Knoxville Street	8,000	8,130	F	1.016	8,759	F	1.095	0.079	Yes	
3. Knoxville Street to Tecolote Road	15,000	16,050	F	1.070	16,647	F	1.110	0.040	Yes	
4. Tecolote Road to Viola Street	15,000	15,610	F	1.041	15,650	F	1.043	0.002	No	
W. Morena Boulevard										
5. Morena Boulevard to Sea World	40,000	11,990	Α	0.300	12,070	Α	0.302	0.002	No	
Drive Overcrossing		11,990	A	0.300	12,070	A	0.302	0.002	INO	
Tecolote Road										
6. I-5 NB Ramps to Morena Boulevard	40,000	22,310	С	0.558	22,868	С	0.572	0.014	No	
Sea World Drive										
7. E. Mission Bay Drive to I-5 SB	55,000	32,530	С	0.591	32,610	С	0.593	0.002	No	
Ramps	33,000	32,330	ر	0.391	32,010	J	0.393	0.002	INU	

^aCapacities based on City of San Diego Roadway Classification & LOS table (see Appendix D).

b. Near-Term Plus Project (Opening Day Year 2021)

The Near-Term Plus Project condition was modeled to forecast traffic conditions associated with the project and other foreseeable cumulative project traffic. A growth factor of approximately 1 percent per year on average throughout the study area was used to account for cumulative projects as research to locate future projects in the study have produced limited results. The near-term analysis was completed assuming the existing lane geometries and intersection controls. Figure 4.6-4 shows AM/PM peak hour turning movements and ADT on street segments within the study area under the Near-Term Opening Day 2021 condition. Figure 4.6-5 shows traffic volumes under the Near-Term Opening Day 2021 Plus Project condition.

Intersections

As shown in Table 4.6-6, with the addition of cumulative projects and project traffic all intersections would operate at LOS D or better. Therefore, impacts to intersections under the Near-Term Plus Project condition would be less than significant.

^bADT = average daily traffic

^cLOS= level of service

^dV/C = volume-to-capacity ratio

^e∆ denotes a project-induced increase in the V/C ratio. A 0.05 increase is allowable at LOS F

fSig? = Significant impact, yes or no

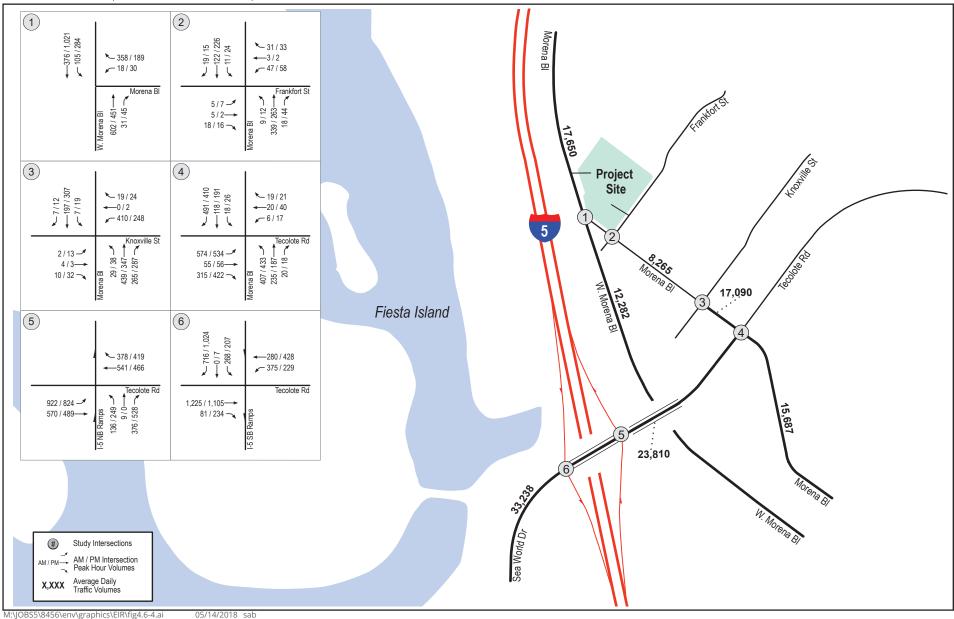


FIGURE 4.6-4 Near-Term Opening Day 2021 without Project Traffic Volumes

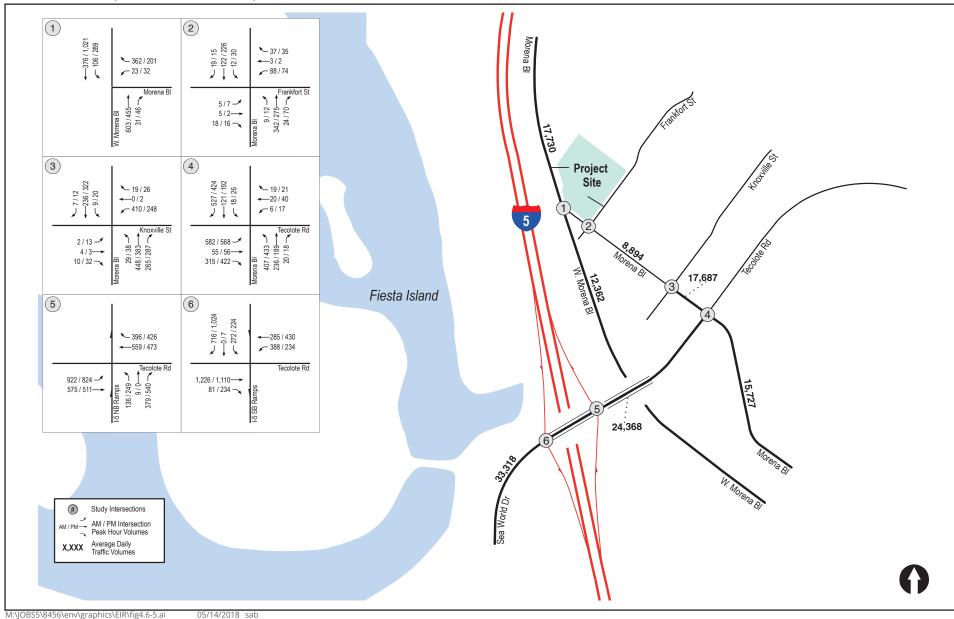


FIGURE 4.6-5 Near-Term Opening Day 2021 Plus Project Traffic Volumes

			4.6-6					
	Near-Teri	m Inters	ection Op	erations				
						Γerm +		
	Control	Peak	Near-T			ject	Delay	d
Intersection	Type	Hour	Delay ^a	LOS ^b	Delay ^a	LOS ^b	Δ^{c}	Sig? ^d
1. Morena Blvd./W. Morena Blvd.	Signal	AM	14.1	В	14.2	В	0.1	No
Triviorena Biva.	3181101	PM	10.5	В	10.8	В	0.3	110
2. Morena Blvd./Frankfort St.	MSSC ^e	AM	14.1	В	16.2	С	2.1	No
2. Wortha Biva./Trankfort St.	WISSC	PM	15.1	С	17.0	С	1.9	110
3. Morena Blvd./Knoxville St.	Signal	AM	13.7	В	14	В	0.3	No
5. Worena biva./Knoxville 5t.	JigiTul	PM	7.8	Α	8.0	Α	0.2	110
4. Morena Blvd./Tecolote Rd.	Signal	AM	35.7	D	38.5	D	2.8	No
4. Moreria Biva./ recolote Na.	Jigi lai	PM	31.7	С	32.5	С	0.8	NO
5. Tecolote Rd./I-5 NB Ramps	Signal	AM	48.2	D	53.5	D	5.1	No
5. recolote Rd./1-5 NB Ramps	Jigi lai	PM	52.8	D	63.8	D	1.0	INO
6. Sea World Dr./I-5 SB Ramps	Signal	AM	23	С	23.5	С	0.5	No
·		PM	20.8	С	21.7	С	0.9	INO
^a Average delay expressed in second	ls per vehic	le	9	SIGNALIZ	ZED	UNSIGN	NALIZED	
^B LOS = level of service				DELAY/L	.OS	DELA'	Y/LOS	
^c Δ denotes the increase in delay due	e to project		Т	HRESHC	LDS	THRES	HOLDS	
dSig? = Significant impact, yes or no			D	elay	LOS	Delay	LC	S
eMSSC = Minor Street Stop-Controlle	ed intersec	tion;	0.0	≤ 10.0	Α	0.0 ≤ 10.	.0 A	
worst movement delay reported			10.1	to 20.0	В	10.1 to 15	.0 B	}
			20.1	to 35.0	C	15.1 to 25	.0 C	
			35.1	to 55.0	D	25.1 to 35	.0 D)
			55.1	to 80.0	Е	35.1 to 50	.0 E	:
				≥ 80.1	F	≥ 50	.1 F	:

Street Segments

As shown in Table 4.6-7, with the addition of cumulative projects and project traffic all street segments would continue to operate at LOS C or better, except for the following:

- Segment #2. Morena Boulevard: Frankfort Street to Knoxville Street LOS F
- Segment #3. Morena Boulevard: Knoxville Street to Tecolote Road LOS F
- Segment #4. Morena Boulevard: Tecolote Road to Viola Street LOS F

As shown in Table 4.6-7, these three street segments would operate at LOS F without the project under the Near-Term condition. The increase in V/C ratio due to project traffic for Segment #4 would be 0.002 which is less than the allowable increase of 0.01 for a segment operating at LOS F.

		Table	4.6-7						
	Near-Term	n Street S	egment	Operati	ons				
	Existing	N	ear Tern	n	Near T	erm + Pi	roject		
Street Segment	Capacity (LOS E) ^a	ADT ^b	LOS ^c	V/C ^d	ADT ^b	LOS ^c	V/C ^d	Δ ^e	Sig? ^f
Morena Boulevard	(LOS L)	ADI	103	V/C	ADI	LOS	V/C	Ц	216.
Asher Street to W. Morena Boulevard	40,000	17,650	В	0.443	17,730	В	0.443	0.002	No
2. Frankfort Street to Knoxville Street	8,000	8,265	F	1.033	8,894	F	1.112	0.079	Yes
3. Knoxville Street to Tecolote Road	15,000	17,090	F	1.139	17,687	F	1.179	0.040	Yes
4. Tecolote Road to Viola Street	15,000	15,687	F	1.046	15,727	F	1.048	0.002	No
W. Morena Boulevard									
5. Morena Boulevard to Sea World Drive Overcrossing	40,000	12,282	Α	0.307	12,362	Α	0.309	0.002	No
Tecolote Road									
6. I-5 NB Ramps to Morena Boulevard	40,000	23,810	В	0.595	24,368	С	0.609	0.014	No
Sea World Drive									
7. E. Mission Bay Drive to I-5 SB Ramps	55,000	33,238	С	0.604	33,218	С	0.606	0.002	No

^aCapacities based on City of San Diego Roadway Classification & LOS table (see Appendix D).

Segments #2 and #3 would exceed the City's significance threshold increase of 0.01 for a segment operating at LOS F (Segment #2 would result in a V/C increase of 0.079 and Segment #3 would result in a V/C increase of 0.039), resulting in a significant impact.

c. Year 2035 Plus Project

Year 2035 transportation network conditions and vehicular volumes were based on the analysis completed for the MBAP (see Section 4.6.2.2.d). The MBAP recommended Mobility Plan focuses on improvements to Morena Boulevard and West Morena Boulevard within the MBAP study area. The plan includes new street connections in the southern portion of the study area and the reorganization of roadway conditions around the triangular parcel of land bordered by Napa Street, Morena Boulevard, and Linda Vista Road. Buildout of the MBAP Preferred Alternative Classifications were assumed for the Year 2035 condition and are shown in Table 4.6-8. Figure 4.6-6 shows AM/PM peak hour turning movements and ADT on street segments within the study area under the Year 2035 without Project condition. Figure 4.6-7 shows AM/PM peak hour turning movements and ADT on street segments within the study area under the Year 2035 Plus Project condition.

Traffic volume forecasts for the Year 2035 condition analysis were determined using SANDAG Series 12 travel demand model. Additional details of the modeling are discussed in Section 11.2 of the TIA.

^bADT = average daily traffic

^cLOS = level of service

^dV/C = volume-to-capacity ratio

 $^{^{\}rm e}\!\Delta$ denotes a project-induced increase in the V/C ratio; a 0.05 increase is allowable at LOS F

fSig? = significant impact, yes or no

Table 4.6-8 Community Plan Roadway Classifications								
		MBAP Preferred						
Street Segment	Currently Built As	Alternative Classification ^a						
Morena Boulevard								
1. Asher Street to W. Morena Boulevard	4-Lane Major	3-Lane Collector						
2. Frankfort Street to Knoxville Street	2-Lane Collector	2-Lane Collector						
3. Knoxville Street to Tecolote Road	2-Lane Collector	2-Lane Collector						
4. Tecolote Road to Viola Street	3-Lane Collector	3-Lane Collector						
W. Morena Boulevard								
5. Morena Boulevard to Sea World Drive	4-Lane Major	3-Lane Collector						
Overcrossing								
Tecolote Road	4-Lane Major	4-Lane Major						
6. I-5 NB Ramps to Morena Boulevard	4-Lane Major	4-Larie Major						
SeaWorld Drive	5-Lane Prime	5-Lane Prime						
7. E. Mission Bay Drive to I-5 SB Ramps	J-Lane Finne	J-Lane Finne						

SOURCE: Transportation Impact Analysis (Appendix D).

NOTE: Year 2035 traffic analysis in this report assumes Morena Boulevard Station Area Planning Study Preferred Alternative Roadway Classifications.

^aGeneral Plan classifications shown are based on Morena Boulevard Station Area Planning Study.

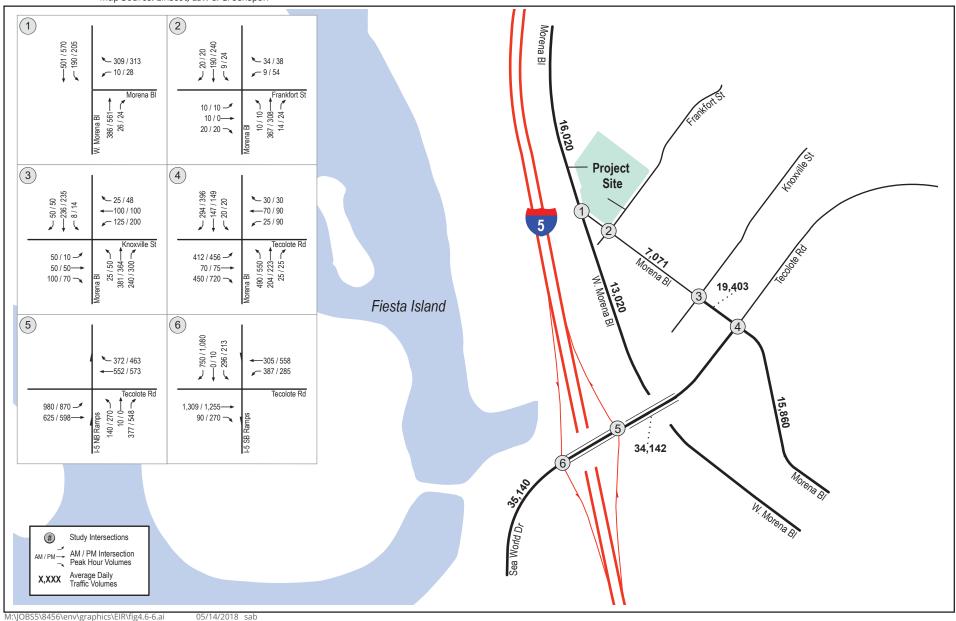
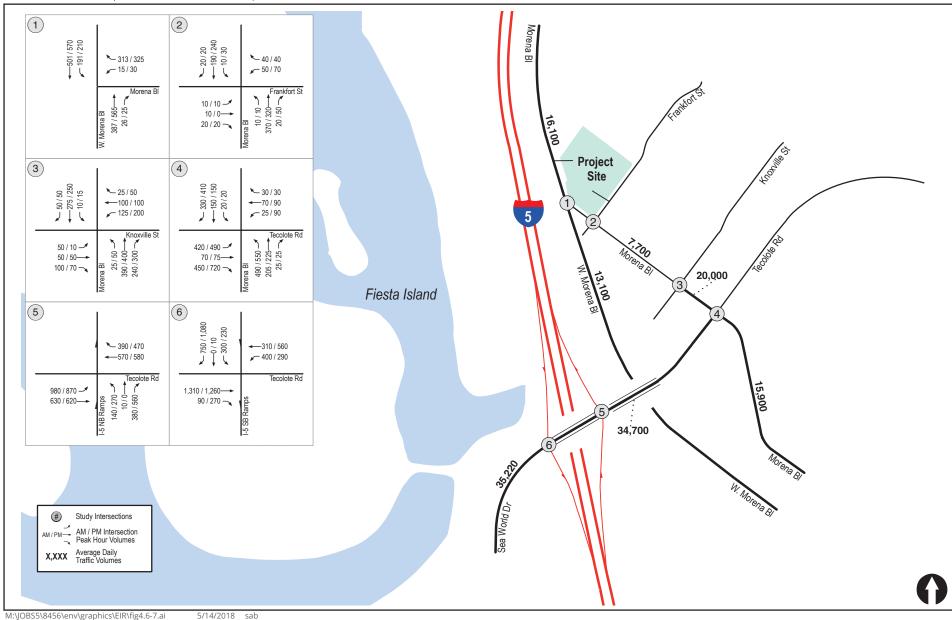


FIGURE 4.6-6 Year 2035 without Project Traffic Volumes



5/14/2018 sab

FIGURE 4.6-7 Year 2035 Plus Project Traffic Volumes

	Vee: 202		4.6-9	untinun.				
	Year 203	5 interse	ection Ope Year 2		Year	2025		
	Control	Peak	without		with P		Delay	
Intersection	Type	Hour	Delay ^a	LOSb	Delay ^a	LOS ^b	Δ^{c}	Sig? ^d
		AM	12.3	B	12.4	В	0.1	
1. Morena Blvd./W. Morena Blvd.	Signal	PM	13.4	В	13.8	В	0.4	No
2. Marria Blad (5 and 6 a 6)	MCCC	AM	12.9	С	15.8	С	2.9	N.
2. Morena Blvd./Frankfort St.	MSSC ^e	PM	15.6	С	17.7	С	2.1	No
3. Morena Blvd./Knoxville St.	Cianal	AM	8.0	Α	8.1	Α	0.1	No
3. Morena Biva./Knoxville St.	Signal	PM	9.4	Α	9.7	Α	0.3	- No
4. Morena Blvd./Tecolote Rd.	Cignal	AM	31.7	С	34.1	С	2.4	No
4. Moreria Biva./ recolote Rd.	Signal	PM	41.6	D	42.5	D	0.9	
5. Tecolote Rd./I-5 NB Ramps	Signal	AM	48.9	D	50.9	D	2.0	No
3. Tecolote Rd./1-3 NB Ramps	Jigi iai	PM	71.3	Е	72.7	Е	1.4	NO
6. Sea World Dr./I-5 SB Ramps	Signal	AM	26.9	С	27.4	С	0.5	No
'		PM	24.1	С	25.1	С	1.0	INO
^a Average delay expressed in second	ls per vehic	:le		SIGNALIZ	ŒD.	UNSIC	SNALIZED)
^B LOS = level of service				DELAY/L	OS	DEL	AY/LOS	
^c Δ denotes the increase in delay due	e to project		Т	HRESHO	LDS	THRE	SHOLDS	
dSig? = Significant impact, yes or no				elay	LOS	Delay	, L	OS
^e MSSC = Minor Street Stop-Controll	ed intersec	tion.	0.0	≤ 10.0	Α	0.0 ≤ 1	0.0	A
Worst movement delay reported			10.1	to 20.0	В	10.1 to 1	5.0	В
			20.1	to 35.0	C	15.1 to 2	25.0	C
			35.1	to 55.0	D	25.1 to 3	35.0	D
			55.1	to 80.0	Е	35.1 to 5	0.0	E
				≥ 80.1	F	≥ 5	0.1	F

Intersections

As shown in Table 4.6-9, all intersections would operate at LOS D or better under the Year 2035 Plus Project condition except the following:

Intersection #5. Tecolote Road/I-5 NB Ramps – LOS E during the PM peak hour

However, this intersection would operate at LOS E without the project in the Year 2035 condition. With the project, there would be a 1.4-second increase in delay at the intersection, which is less than the City threshold of up to a 2-second delay for intersections at LOS E. Therefore, cumulative impacts to intersections under the Year 2035 Plus Project condition would be less than significant.

Street Segments

As shown in Table 4.6-10, all street segments would operate at LOS D or better under Year 2035 Plus Project condition, except for the following:

- Segment #2. Morena Boulevard: Frankfort Street to Knoxville Street LOS E
- Segment #3. Morena Boulevard: Knoxville Street to Tecolote Road LOS F
- Segment #4. Morena Boulevard: Tecolote Road to Viola Street LOS F

Based on the City of San Diego's published criteria, a significant cumulative impact is calculated for the following segments:

- Segment #2. Morena Boulevard: Frankfort Street to Knoxville Street LOS E
- Segment #3. Morena Boulevard: Knoxville Street to Tecolote Road LOS F

		Year 2035	Table 4 Street Se		Operatio	ns				
	General Plan	Existing Capacity		ear 2035 iout Proj			ear 2035 th Projec			
Street Segment	Capacity	(LOS E) ^a	ADT ^b	LOS ^c	V/C ^d	ADT ^b	LOS ^c	V/C ^d	Δ^{e}	Sig? ^f
Morena Boulevard										
Asher Street to W. Morena Boulevard	22,500	40,000	16,020	D	0.712	16,100	D	0.719	0.003	No
2. Frankfort Street to Knoxville Street	8,000	8,000	7,071	Е	0.884	7,700	E	0.963	0.079	Yes
3. Knoxville Street to Tecolote Road	15,000	15,000	19,403	F	1.294	20,000	F	1.333	0.039	Yes
4. Tecolote Road to Viola Street	15,000	15,000	15,860	F	1.057	15,900	F	1.060	0.003	No
W. Morena Boulevard										
5. Morena Boulevard to Sea World Drive Overcrossing	22,500	40,000	13,020	С	0.579	13,100	С	0.582	0.003	No
Tecolote Road		•	•		•		•	•	•	•
6. I-5 NB Ramps to Morena Boulevard	40,000	40,000	34,142	D	0.854	34,700	D	0.868	0.014	No
Sea World Drive						·		·		
7. E. Mission Bay Drive to I-5 SB Ramps	55,000	55,000	35,140	С	0.639	35,220	С	0.640	0.001	No

^aCapacities based on City of San Diego Roadway Classification & LOS table (see Appendix D).

Segment #2 would exceed the allowable project-induced increase of 0.02 V/C for a segment operating at LOS E, resulting in a significant impact. Segment #3 would exceed the allowable project-induced increase of 0.01 V/C for a segment operating at LOS F, resulting in a significant impact.

4.6.4.2 Significance of Impacts

a. Existing Plus Project Impacts

As summarized below, under the Existing Plus Project condition, implementation of the project would not result in a project area intersection to operate above the allowable significance thresholds associated with traffic generation. However, implementation of the project would result in two project area road segments to exceed the allowable significance thresholds associated with traffic generation.

^bADT = average daily traffic

^cLOS = level of service

^dV/C = volume-to-capacity ratio

 $^{^{\}rm e}\Delta$ denotes a project-induced increase in the V/C ratio. An increase up to 0.02/0.01 is allowable at LOS E/LOS F, respectively.

fSig? = Significant impact, yes or no

Intersections

Table 4.6-4 shows that all intersections would operate at LOS D or better under Existing Plus Project conditions. Therefore, impacts to intersections under the Existing Plus Project condition would be less than significant.

Street Segments

Table 4.6-5 shows that three street segments would operate at LOS F under Existing Plus Project conditions. However, the V/C increase for Segment #4 would fall below the significance threshold for a segment operating at LOS F, resulting in a less than significant impact. The V/C increase for Segments #2 and #3 (Morena Boulevard, from Frankfort Street to Knoxville Street, and from Knoxville Street to Tecolote Road) would exceed the significance threshold for a segment operating at LOS F, resulting in a significant impact.

b. Near-Term Plus Project (Opening Day Year 2021) Impacts

As summarized below, under the Near-Term Plus Project condition, implementation of the project would not result in a project area intersection to operate above the allowable significance thresholds associated with traffic generation. However, implementation of the project would result in project area road segments to exceed allowable significance thresholds associated with traffic generation.

Intersections

Table 4.6-6 shows that all intersections would operate at LOS D or better under Near-Term Plus Project conditions. Therefore, impacts to intersections under the Near-Term Plus Project condition would be less than significant.

Street Segments

Table 4.6-7 shows that three street segments along Morena Boulevard would operate at LOS F under Near-Term Plus Project conditions. However, the V/C increase for Segment #4 would fall below the significance threshold for a segment operating at LOS F, resulting in a less than significant impact. The V/C increase for Segments #2 and #3 (Morena Boulevard, from Frankfort Street to Knoxville Street, and from Knoxville Street to Tecolote Road) would exceed the significance threshold for a segment operating at LOS F, resulting in a significant direct impact.

c. Year 2035 Plus Project Impacts

As summarized below, under the Year 2035 Plus Project condition, implementation of the project would not result in a project area intersection to operate above the allowable significance thresholds associated with traffic generation. However, implementation of the project would result in project area road segments to exceed the allowable significance thresholds associated with traffic generation.

Intersections

As shown in Table 4.6-8, the Tecolote Road/I-5 NB Ramps intersection would operate at LOS E during the PM peak hour. However, this intersection would operate at LOS E without the project in the Year 2035 Plus Project condition and the increase in delay associated with the project would be less than the City's threshold for intersections at LOS E. Therefore, impacts to intersections under the Year 2035 Plus Project condition would be less than significant.

Street Segments

Table 4.6-9 shows that along Morena Boulevard, two street segments would operate at LOS F and one street segment would operate at LOS E. However, the V/C increase would be less than the allowable increase of 0.02 for Segment #4, resulting in a less than significant impact for this segment. The V/C increase for Segment #2 (Morena Boulevard. Frankfort Street to Knoxville Street) would exceed the significance threshold for a segment operating at LOS E, resulting in a significant impact. The V/C increase for Segment #3 (Morena Boulevard. Knoxville Street to Tecolote Road) would exceed the significance threshold for a segment operating at LOS F, resulting in a significant cumulative impact.

4.6.4.3 Mitigation, Monitoring, and Reporting

The project would implement mitigation measure TRA-1, which would require installation of an adaptive signal control system at three intersections along West Morena Boulevard, as described below:

TRA-1: Installation of Adaptive Signal Control System

Prior to issuance of any building permit, the Owner/Permittee shall assure, by permit and bond, the installation of an adaptive signal control system at three intersections on Morena Boulevard, to the satisfaction of the City Engineer. The three intersections along Morena Boulevard would include West Morena Boulevard, Knoxville Street, and Tecolote Road. Improvements shall include enhanced fiber-optic signal interconnects and communications, additional detection sensors and computer equipment at each intersection, and a remote link to the Traffic Management Center downtown, satisfactory to the City Engineer. A proposed implementation plan for installation of the adaptive signal control system shall be provided to the City of San Diego by the applicant as early as possible. All improvements shall be completed and accepted by the City Engineer prior to first occupancy.

4.6.4.4 Significance of Impacts after Mitigation

a. Existing Plus Project Impacts

Implementation of mitigation measure TRA-1 would reduce direct road segment impacts to Morena Boulevard between Frankfort Street to Tecolote Road (Segments #2 and #3) to less than significant.

b. Near-Term Plus Project Impacts (Opening Day Year 2021)

Implementation of mitigation measure TRA-1 would reduce direct road segment impacts to Morena Boulevard between Frankfort Street and Tecolote Road (Segments #2 and #3) to less than significant.

c. Year 2035 Plus Project impacts

Implementation of mitigation measure TRA-1 would reduce the cumulative road segment impact to Morena Boulevard between Frankfort Street to Tecolote Road (Segments #2 and #3) to less than significant.

4.6.5 Issue 2: Parking

Would the project result in increased demand for off-site parking or affect existing parking?

4.6.5.1 Impacts

The analysis of impacts under issue 2 addresses Significance Determination Thresholds 7 and 8 as detailed in Section 4.6.3, above.

The project would incorporate a total of 267 vehicular parking spaces, including 99 attached garages, 52 detached carports with 1 accessible parking space, 1 detached maintenance garage, and 115 open parking spaces with 2 accessible parking spaces. In addition, 70 bicycle parking spaces and 16 motorcycle parking spaces are proposed. Proposed on-site parking would exceed City minimum parking requirements for the proposed use and would be adequate to accommodate future residents and guests.

Adjacent to the project site, Frankfort Street accommodates on-street parking in the existing condition. With the project roadway frontage improvements along Frankfort Street, parking would also be accommodated on Frankfort Street after project construction. Based on the number of proposed parking spaces on-site, it is not anticipated that residents or visitors of the project site would need to use off-street parking spaces; however, there may be occasional street parking similar to the existing condition. The project would be expected to provide adequate parking to meet the anticipated demands of the 150 multi-family units, and impacts related to an increase in demand for off-site parking and effects on existing parking would be less than significant. Additionally, parking would not affect the accessibility of any public facility such as a park or a beach as there are no such access points in the immediate vicinity.

4.6.5.2 Significance of Impacts

The project would not be expected to increase demand for off-site parking or result in any adverse effects on existing parking. Impacts would be less than significant.

4.6.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.6.6 Issue 3: Circulation Movements and Alternative Transportation

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

Would the project result in a conflict with adopted policies, plans or programs supporting alternative transportation models (e.g., bus turnouts, bicycle racks)?

Would the project result in substantial alterations to present circulation movements that restrict access to public or private land?

4.6.6.1 Impacts

The analysis of impacts under issue 3 addresses Significance Determination Thresholds 5 and 6 as detailed in Section 4.6.3. As described in Section 4.6.4.1 above, the project would result in a significant impact along two segments of Morena Boulevard between Frankfort Street to Knoxville Street and from Knoxville Street to Tecolote Road. These segments also operate at LOS F under the existing conditions. However, the project would implement mitigation measure TRA-1, which would require installation of an adaptive signal control system at three intersections along Morena Boulevard. Installation of this system is anticipated to improve circulation and traffic flow along Morena Boulevard compared to the existing condition. Furthermore, this mitigation measure would not require any changes to the roadway configuration that could conflict with adopted plans supporting alternative transportation. Project implementation would not interfere or conflict with implementation of planned transportation improvements in the area, as detailed in the analysis of transportation objectives of the CMCP, provided in Table 4.1-1. The project would not require changes to the existing circulation network and would be consistent with the planned circulation network including mobility planning efforts identified in both the CMCP and the MBAP. Additionally, the project site is located in an urbanized area and would not impact existing roadways that provide direct public access to beaches, parks, or other open space areas. Therefore, impacts related to circulation movements and inconsistency with existing or planned transportation systems would be less than significant.

a. Bicycle/Pedestrian Systems

There are currently no bicycle facilities provided on either of the roadways fronting the project site. The MBAP identified numerous enhancements in the vicinity of Morena Boulevard and West Morena Boulevard, including the following:

- Buffered Class 2 bike lanes on both sides of Morena Boulevard.
- A multi-use Class 1 path, with a tree-planted parkway buffer proposed on the west side of Morena Boulevard.

• A trail proposed along Tecolote Creek on the northern side of Tecolote Road between Morena Boulevard and West Morena Boulevard, providing pedestrian access.

The project would provide half-width frontage improvements and dedication of right-of-way along the east side (northbound direction) of Morena Boulevard to provide the buffered Class 2 bike lane described above.

The project would also provide on-site bicycle parking racks to accommodate up to 70 bicycles.

The project incorporates internal pedestrian pathways that provide direct connections to Frankfort Street, close to the corner of Morena Boulevard. This pedestrian connection to Frankfort Street would provide convenient access to the existing bus stop at this corner. Similarly, there are commercial amenities located across Frankfort Street that would be directly accessible by pedestrians from the proposed pedestrian access point. The project design would also include pedestrian access at the northern end of West Morena Boulevard to provide easy access to amenities along Morena Boulevard to the North. Where there is currently no sidewalk along Frankfort Street, the project would install a sidewalk, improving pedestrian connectivity. No pedestrian access is provided to Tonopah Avenue, because the roadway sits atop a steep slope above grade from the project site. Additionally, there are no local amenities or activity centers directly accessed from Tonopah Avenue. The project would provide frontage improvements including sidewalks along Frankfort Street, Morena Boulevard, and West Morena Boulevard. Thus, with the proposed internal private pedestrian connections to the improved public sidewalks, the project incorporates pedestrian amenities consistent with applicable pedestrian mobility policies.

Thus, the project would not conflict with any planned bicycle/pedestrian measures.

b. Transit

There currently is a bus stop located on Morena Boulevard immediately adjacent to the site, served by Route 105, which contains a bench. This bus stop would be relocated to the same general area after the frontage improvements are complete. These improvements include an installation of a concrete bus pad (12 feet wide by 75 feet long) on Morena Boulevard, as well as additional convenience features such as a bus shelter and trash can. Additionally, the Mid-Coast Corridor Transit Project would extend the Trolley Blue Line service from the Old Town Transit Center to major destinations in the north including University of California, San Diego and Westfield UTC. The extension will serve nine new stations including Tecolote Road, which would be an approximately 5-minute walk (0.3 mile) from the project site. The project's residential densities would be supportive of this future trolley station and would not conflict with the existing or future transit facilities.

Project implementation would not result in a substantial impact on existing or planned transportation systems. The location of the project site would be conducive to resident's use of transit, considering both existing and planned transit opportunities. Impacts would be less than significant.

4.6.6.2 Significance of Impacts

Implementation of the project would not result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, or propose roadways that would not properly align with other existing or planned transportation systems. The project would not conflict with adopted policies, plans, or programs supporting alternative transportation models. Impacts to existing or planned transportation systems or adopted policies, plans, or programs supporting alternative transportation would be less than significant. See also Table 4.1-1 for additional discussion of the project's consistency with applicable mobility and alternative transportation policies.

4.6.6.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.6.7 Issue 4: Traffic Hazards

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

4.6.7.1 Impacts

This analysis of impacts under issue 4 addresses Significance Determination Threshold 4 as detailed in Section 4.6.3.

Site access for the existing RV park is provided by a full-access driveway on Frankfort Street, approximately 155 feet from the intersection with Morena Boulevard. A right-in/right-out only driveway serving the RV storage area of the project site is located along West Morena Boulevard, approximately 315 feet north of the Morena Boulevard/West Morena Boulevard intersection.

The project would continue to use the driveway access points on Frankfort Street and at the northern end of Morena Boulevard, closing the driveway access to the site from Morena Boulevard close to the West Morena Boulevard/Morena Boulevard intersection. The configurations of the two driveways would generally be maintained, with the Frankfort Street driveway operating as full-access and the Morena Boulevard driveway as right-in/right-out only. Redevelopment of on-site circulation would allow either of the two driveways to be accessed from any project dwelling unit.

Given the size of the project, it is expected that both access points would continue to function adequately. The right-in/right-out driveway on Morena Boulevard located at the north end of the site provides maximum separation downstream of the signalized West Morena Boulevard/Morena Boulevard intersection. The signal operations at this intersection would create sufficient gaps for project traffic to enter. West Morena Boulevard is a straight roadway segment in the project vicinity, and intersection sight distance would not be affected by roadway characteristics such as horizontal or vertical curves. The on-site placement of landscaping and monument signs would maintain appropriate sight distance.

The project would not impede emergency access on roadways serving the project site and the proposed access driveways and internal access roads would be capable of accommodating emergency vehicles. The project would not introduce traffic hazards related to motor vehicles, bicycles, and pedestrians and would not impact emergency access.

Therefore, impacts would be less than significant.

4.6.7.2 Significance of Impacts

Implementation of the project would not result in increased traffic hazards to motor vehicles, bicyclists or pedestrians due to proposed non-standard design features, the threshold for impacts associated with traffic hazards. The project would result in a less than significant impact related to traffic hazards and emergency access.

4.6.7.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.7 Visual Effects and Neighborhood Character

This section addresses the visual aspects of the project and compatibility in terms of neighborhood character with existing and planned land uses. Information presented in this section is based on a review of policies and regulations relevant to the protection of visual resources in the City of San Diego (City), identification of designated or valued scenic views and scenic resources, a site visit, project site photographs, and project renderings.

4.7.1 Existing Conditions

4.7.1.1 Existing Visual Landscape

The project site is situated in the southwest portion of the Clairemont Mesa Community Plan (CMCP). The project site is currently occupied by the Coastal Trailer Villa Recreational Vehicle (RV) park consisting of existing buildings (a single-family residence, offices, laundry, and storage), internal roads and driveways, 90 RV spaces, and landscaping. The landscaping is located mostly around the perimeter of the project site and includes a mixture of native shrubs and trees and common ornamental species, such as palm trees, prickly cactus, and deciduous tree types. Other areas along the site's boundaries consist of weeds and grassy areas intermixed with shrubs. Additionally, the area just north of the RV park is occupied by two duplexes, one single-family residence, and old barn and an area used for storage of trucks and boats.

The project site is located east of Interstate 5 (I-5), the Los Angeles-San Diego-San Luis Obispo (LOSSAN) rail corridor, and West Morena Boulevard; northwest of Frankfort Street; northeast of the West Morena Boulevard and Morena Boulevard intersection, and south of Tonopah Avenue. The project site is surrounded by a mixture of commercial and residential development, with an assortment of commercial land uses within a quarter mile of the project site including a gas station, smog inspection station, animal hospital, and indoor shooting range to the south; a jazz club and an auto repair shop to the northwest; and a convenience store, Mexican restaurant, and professional offices (architect and engineering) to the southeast. Single-family residences, recognized as the neighborhood of Bay Park, are located north and northeast of the site. Refer to Figure 2-3 for an aerial photograph of the project site and surrounding area.

a. Views of the Project Site

The project site is visible from West Morena Boulevard, as well as from Morena Boulevard, Frankfort Street, and Tonopah Avenue. Views of the project site from I-5 are limited due to landscaping along this section of the interstate. The project site is also visible from adjacent commercial and residential properties. In addition, the site is visible from the San Diego Metropolitan Transit System (MTS) bus line 105 route, which passes by the property on Morena Boulevard.

One notable vantage point mentioned in the CMCP is the view that Bay Park residents have of Mission Bay and Mission Bay Park. The views along Tonopah Avenue immediately northeast of the site are located at a higher elevation than the project site itself, offering a view of the horizon line from the east to west (180 degrees). Views located at this vantage point include the entire project site, Mission Bay (partially blocked by intermittent landscaping), Mission Bay Park, and the northern slopes/mesa in association with Tecolote Canyon Natural Park. Key views of the project site looking west and south from the top of the slope at Tonopah Avenue are provided in Figure 4.7-1.

b. Views from the Project Site

The project site is situated adjacent to major transit corridors, with convenient access to secondary streets and public transportation. Since the project site is relatively flat, views from the project site are of the surrounding developments. Views from the southern/southeastern property line are of Morena Boulevard and Frankfort Street, as well as the existing commercial developments. Views looking west from the southwestern property line are of West Morena Boulevard and the Los Angeles-San Diego-San Luis Obispo (LOSSAN) rail corridor. Views of I-5 from the property are limited due to mature eucalyptus trees between the interstate and the rail corridor. Views from the northwestern portion of the project site are of the adjacent commercial properties, while views from the eastern portion of the property are of the existing single-family residences opposite of Frankfort Street. Single-family residences located opposite of Tonopah Avenue are situated at a higher topographic elevation; therefore, the views from the project site looking in the northerly direction consists primarily of an existing cut slope with residences visible by looking up the hill.

c. Neighborhood Character

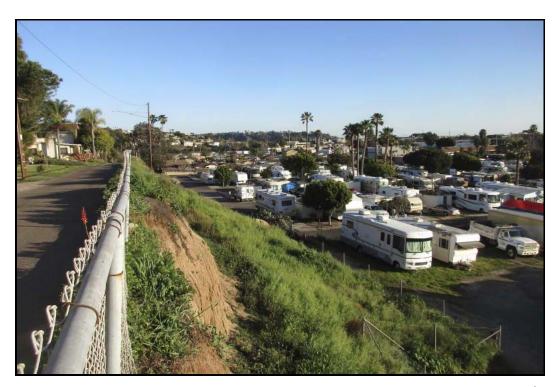
The CMCP area is, in general, an urbanized residential community characterized by single-family residential homes that were built in the 1950s and 1960s. Commercial uses within the CMCP include four shopping centers, approximately 1,370 acres of open space, 11 parks, and 17 public educational facilities (i.e., Mesa Community College). Approximately 186 acres of industrial land uses are located along Morena Boulevard and Santa Fe Street.

The West Morena Boulevard/Morena Boulevard area is a highly built environment with no designated or notable natural landforms, visually unique/interesting buildings, or built amenities. There is an area located approximately 3 miles to the north of the project site, along West Morena Boulevard, which has been labeled as a "design district," offering many interior design-themed stores.

The area surrounding the project site is characterized by a mixture of single-family residential homes located north and northeast, and commercial land uses located south, southeast, and northwest. The commercial land uses surrounding the project site are generally located along the West. Morena and Morena Boulevard transit corridors, with several multi-family and single-family residential developments located on Morena Boulevard, one block southeast of the site.



PHOTOGRAPH 1a View of Project Site Looking West from Tonopah Avenue



PHOTOGRAPH 1b View of Project Site Looking South from Tonopah Avenue

FIGURE 4.7-1 Key Views The commercial areas are primarily service-oriented, and generally do not offer a particular theme or style. The single-family residences located north and northeast of the project site are mixed with old and remodeled homes that are a part of the Bay Park neighborhood. The Bay Park neighborhood, like most of the Clairemont Mesa community, is conveniently accessible to commercial services and natural parks. Residents living in this neighborhood have easy access to Mission Bay Park (opposite of I-5) and Tecolote Canyon Natural Park. Since Bay Park is located on a large slope, residents living and driving in this neighborhood have picturesque views of Mission Bay.

4.7.2 Regulatory Framework

4.7.2.1 General Plan

The General Plan includes City-wide design goals and policies regarding visual elements that complement the goals for pedestrian-oriented and walkable villages from the City of Villages strategy. A village environment includes high-quality public spaces, civic architecture, and the enhancement of visual quality of all types of development.

In its Urban Design (UD) Element, the General Plan establishes goals and policies for the pattern and scale of development and the character of the built environment, which is further supplemented by the specific community plan (i.e., CMCP).

The Urban Design Element policies relevant to the design of the project are listed below.

- Policy UD-A.5: Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.
- Policy UD-A.8: Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.
- Policy UD-A.12: Reduce the amount and visual impact of surface parking lots.
- Policy UD-A.13: Provide lighting from a variety of sources at appropriate intensities and qualities for safety.
- Policy UD-A.16: Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm.
- Policy UD-A.17: Incorporate Crime Prevention Through Environmental Design measures, as necessary, to reduce incidences of fear and crime, and design safer environments.
- Policy UD-B.1: Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.
- Policy UD-B.4: Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.
- Policy UD-B.5: Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.

4.7.2.2 Clairemont Mesa Community Plan

The Urban Design Element of the CMCP identifies a distinct image defined by an urban environment intermixed with nearby, natural canyons. Because of Clairemont's central location within San Diego, this distinct image has provided community residents with convenient access to jobs and recreational opportunities. The Urban Design Element of the CMCP intends to provide design recommendations that are compatible with preserving the community's natural canyons and parks adjacent to a developed urban environment.

The CMCP identifies views to Mission Bay, the Pacific Ocean, the mountains to the east, and the canyons from prominent ridgelines and hillsides located within the community. As a means of preserving the community's established single-family neighborhoods, the CMCP offers a Planned Infill Residential Development (PIRD) permit, which helps assure that new development will be compatible with the existing surrounding development in terms of site design, architecture, and density. In addition, the Clairemont Mesa Height Limitation Zone, enforced throughout most of the community, sets a 30-foot height limit that would maintain vistas from Bay Park to Mission Bay and the Pacific Ocean.

The CMCP also discusses that the surrounding entry-points are not representative of the community's image. Streetscape improvements through landscaping, paving, and signage were identified in the CMCP as a way for new projects to help create a positive image of the community along the public-rights-of-way.

4.7.2.3 Zoning Code

The City's Zoning Code is found in Chapter 13 of the San Diego Municipal Code (SDMC). The Zoning Code helps ensure that land use impacts are minimized, and that building size, density, and intensity are regulated by identifying specific uses and development standards for each zone. Through specifying required and allowable building height, density, front and side setbacks, lighting, signage, screening, and parking (for example), the Zoning Code standards can help define the aesthetic outcome of a proposed development or redevelopment project.

a. Development Standards

The project requires a rezone to the RM-2-5 zone (Residential-Multiple Unit, maximum density of 1 dwelling unit for each 1,500-square-foot lot area). The development standards relevant to visual resources in the zone are as follows:

Floor Area Ratio

The floor area ratio requirement for the project is not to exceed 1.35.

Building Height

Under the CMCP Height Limitation Zone, the building height shall not exceed 30 feet.

Density

The project is allowed 29 dwelling units per acre. For the 5.7-acre project site, this is equivalent to a maximum of 165.3 dwelling units.

Open Space

The project is required to provide a minimum of 60 square feet of private open space and 25 square feet of useable open space per dwelling unit for a total of 12,750 square feet. The project is required to provide a minimum of 190 square feet of common area open space per dwelling unit for a total of 28,000 square feet.

Setbacks

- The required setback for the lot is 15 feet minimum/20 feet standard for front yard, subject to an allowable 5-foot encroachment pursuant to SDMC 131.0443(e)(3).
- The required setback for the side yard is 25.6 feet minimum, subject to an allowable 5-foot encroachment pursuant to SDMC 131.0443(e)(3).
- The required setback for the side street is 25.6 minimum, subject to an allowable 5-foot encroachment pursuant to SDMC 131.0443(e)(3).

b. Standards Pertaining to Light and Glare

Section 142.0740 of the SDMC establishes the requirement for the installation of outdoor lighting fixtures in a manner that minimizes negative impacts from light pollution including light trespass, glare, and urban sky glow in order to preserve enjoyment of the night sky. See SDMC Section 142.0740(a)(1).

In addition to the lighting standards applicable to each zone, SDMC Section 142.0730 regulates glare and provides the following:

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

4.7.3 Significance Determination Thresholds

The following criteria are used by the City to determine significance under California Environmental Quality Act related to visual effects and neighborhood character are based on the City's 2016 Significance Determination Thresholds:

1. Public Views

Projects that would block public views from designated open space areas, roads, or parks or to significant visual landmarks or scenic vistas (Pacific Ocean, downtown skyline, mountains, canyons, waterways) may result in a significant impact. To meet this significance threshold, one or more of the following conditions must apply:

- a. The project would substantially block a view through a designated public view corridor as shown in an adopted community plan, the General Plan, or the Local Coastal Program. Minor view blockages would not be considered to meet this condition. In order to determine whether this condition has been met, consider the level of effort required by the viewer to retain the view;
- b. The project would cause substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable community plan. Unless the project is moderate to large in scale, condition "c" would typically have to be met for view blockage to be considered substantial;
- c. The project exceeds the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area;
- d. The project would have a cumulative effect by opening up a new area for development, which will ultimately cause "extensive" view blockage. (Cumulative effects are usually considered significant for a community plan analysis, but not necessarily for individual projects. Project level mitigation should be identified at the community plan level). View blockage would be considered "extensive" when the overall scenic quality of a visual resource is changed; for example, from an essentially natural view to a largely manufactured appearance.

Note: Views from private property are not protected by CEQA or the City of San Diego.

2. Neighborhood Character/Architecture

Projects that severely contrast with the surrounding neighborhood character would result in a significant impact. To meet this significance threshold, one or more of the following conditions must apply:

- a. The project exceeds the allowable height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin.
- b. The project would have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme (e.g., Gaslamp Quarter, Old Town).
- c. The project would 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.

- d. The project is located in a highly visible area (e.g., on a canyon edge, hilltop, or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections.
- e. The project would have a cumulative effect by opening up a new area for development or changing the overall character of the area (e.g., rural to urban, single-family to multifamily). As with views, cumulative neighborhood character effects are usually considered significant for a community plan analysis, but not necessarily for individual projects. Project level mitigation should be identified at the community plan level. Analysts should also evaluate the potential for a project to initiate a cumulative effect by building structures that substantially differ from the character of the vicinity through height, bulk, scale, type of use, etc., when it is reasonably foreseeable that other such changes in neighborhood character will follow.

3. Landform Alteration/Grading

Projects that significantly alter the natural landform would result in a significant impact. To meet this significance threshold, typically the following conditions must apply:

- a. The project would alter more than 2,000 cubic yards of earth per graded acre by either excavation or fill. Grading of a smaller amount may still be considered significant in highly scenic or environmentally sensitive areas. Excavation for garages and basements are typically not held to this threshold. In addition, one or more of the following conditions (1-4) must apply to meet this significance threshold.
 - 1) The project would disturb steep hillsides in excess of the encroachment allowances of the Environmentally Sensitive Lands regulations (LDC Chapter 14, Article 3, Division 1).
 - 2) The project would create manufactured slopes higher than ten feet or steeper than 2:1 (50 percent).
 - 3) The project would result in a change in elevation of steep hillsides as defined by the SDMC Section 113.0103 from existing grade to proposed grade of more than five feet by either excavation or fill, unless the area over which excavation or fill would exceed five feet is only at isolated points on the site.
 - 4) The project design includes mass terracing of natural slopes with cut or fill slopes in order to construct flat-pad structures.

- b. However, the above conditions may not be considered significant if one or more of the following apply:
 - 1) The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms will very closely imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms. This may be achieved through —naturalized variable slopes.
 - 2) The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed slopes follow the natural existing landform and at no point vary substantially from the natural landform elevations.
 - 3) The proposed excavation or fill is necessary to permit installation of alternative design features such as step-down or detached buildings, non-typical roadway or parking lot designs, and alternative retaining wall designs which reduce the project 's overall grading requirements.

4. Development Features

Projects that have a negative visual appearance would result in a significant impact. To meet this significance threshold, one or more of the following conditions must apply:

- a. The project would create a disorganized appearance and would substantially conflict with City codes (e.g., a sign plan which proposes extensive signage beyond the City's sign ordinance allowance).
- b. The project significantly conflicts with the height, bulk, or coverage regulations of the zone and does not provide architectural interest (e.g., a tilt-up concrete building with no offsets or varying window treatment).
- c. he project includes crib, retaining, or noise walls greater than six feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public.

These conditions may become more significant for projects that are highly visible from designated open spaces, roads, parks, or significant visual landmarks. The significance threshold may be lower for such projects. Refer to the project's applicable community plan and the Urban Design Element of the City's Progress Guide and General Plan for more information on visual quality.

5. Light/Glare

Projects that would emit or reflect a significant amount of light and glare would result in a significant impact. To meet this significance threshold, one or more of the following must apply:

a. The project would be moderate to large in scale, more than 50 percent of any single elevation of a building 's exterior is built with a material with a light reflectivity greater

- than 30 percent (see LDC Section 142.07330(a)), and the project is adjacent to a major public roadway or public area.
- b. The project would shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas.

4.7.4 Issue 1: Public Views

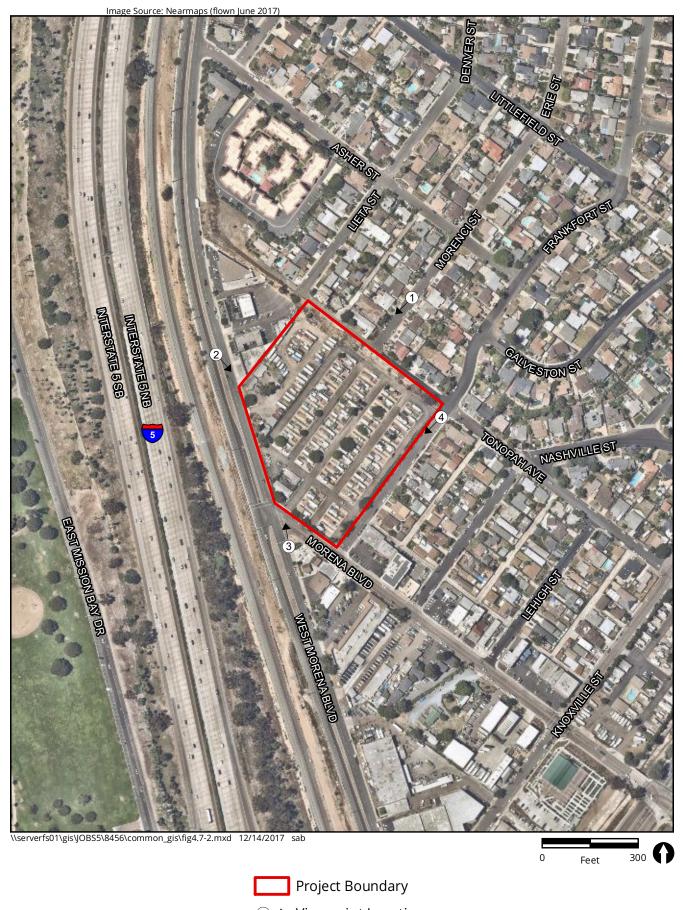
Would the project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

4.7.4.1 Impacts

The analysis of impacts in this section addresses Significance Determination Threshold 1 as detailed in Section 4.7.3, above. Views of Mission Bay and the Pacific Ocean are key public views for the surrounding community. These resources are visible from many residences and from public roadways east of the project site that are situated at a high enough elevation to afford views of the bay and ocean. The project site is adjacent to Tonopah Avenue, a publicly accessible street that offers views of the surrounding area, including Mission Bay. The existing Tonopah Avenue vantage point is at an elevation of 52 feet above mean sea level (AMSL); the proposed construction would not exceed an elevation of 41 feet AMSL. Therefore, the height of the proposed buildings would not result in a substantial view blockage from Tonopah Avenue.

In order to further evaluate the potential effect the project could have on public views toward the bay, visual simulations of the project site were completed to identify the potential view blockage that could result from proposed buildings as viewed from the east toward the west. Figure 4.7-2 identifies the four locations where visual simulations were completed. Viewpoint 1 represents a southwest view toward Mission Bay on Morenci Street. Viewpoint 1 in the existing condition is represented in Figure 4.7-3a. As shown in this view, bay views are obscured by landscaping at this location. Viewpoint 1 in the proposed condition is shown on Figure 4.7-3b, which represents the same viewpoint as the project. As shown in the figure, the tops of the buildings would be visible from the east; however, views toward the bay would not be substantially blocked. Access to Tonopah Avenue and surrounding public roadways would remain accessible and views from these public roads would not be blocked by the project.

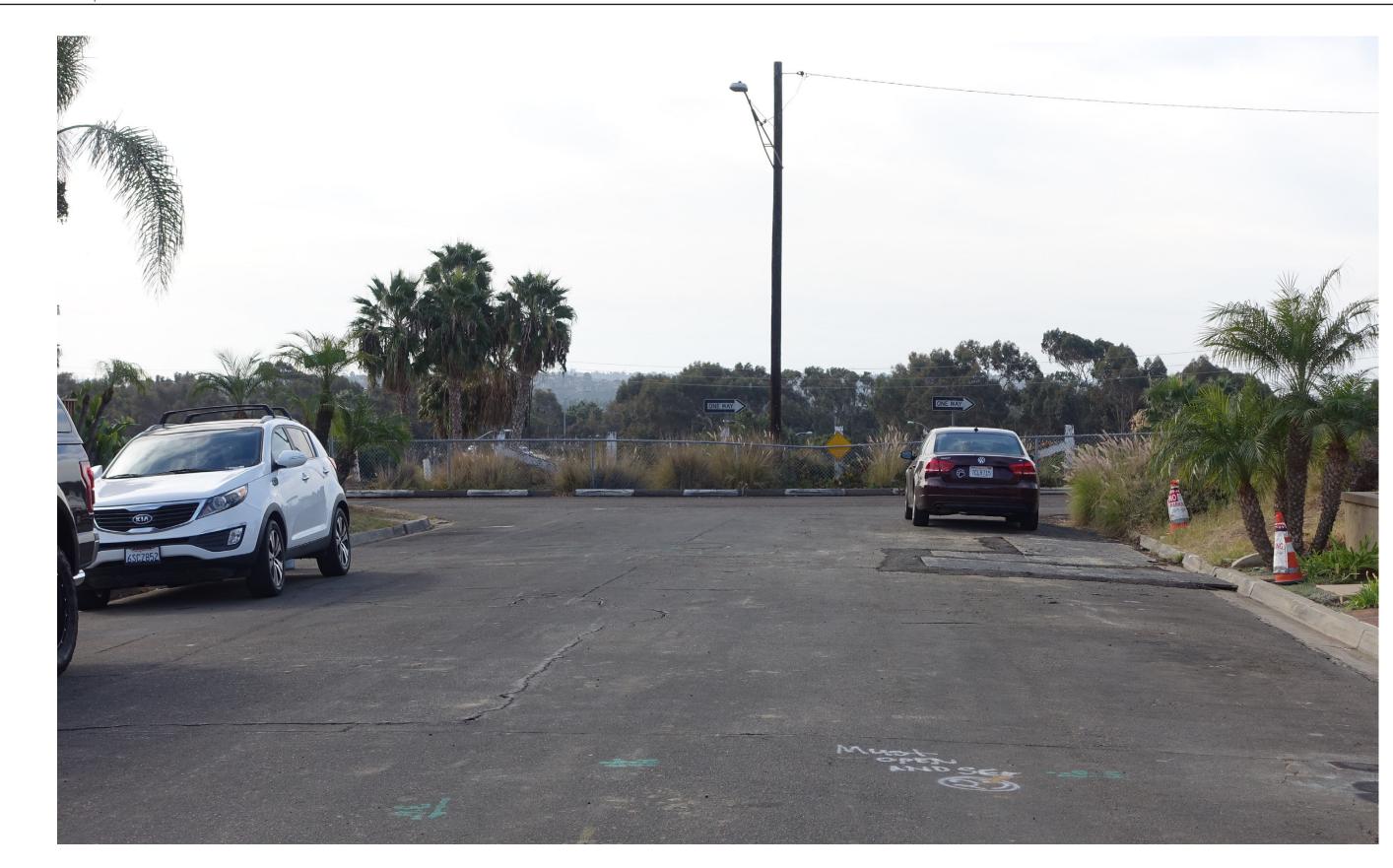
Within the context of the community, the project site is located at the bottom of a large slope, with areas east of the project site developed at higher base elevations that the project site. Thus, the topography of the community is such that the project would not block views of Mission Bay or the Pacific Ocean because the project would comply with the CMCP height restriction of 30 feet and the project would be set below areas to the east that have access to views. As shown in Figure 3-7, the project would be below the top of the slope at Tonopah Avenue, essentially eliminating the potential for view blockage for surrounding residences. Additionally, the project would not exceed allowed height or bulk regulations (see Section 4.7.5, below) resulting in the blockage of any views.



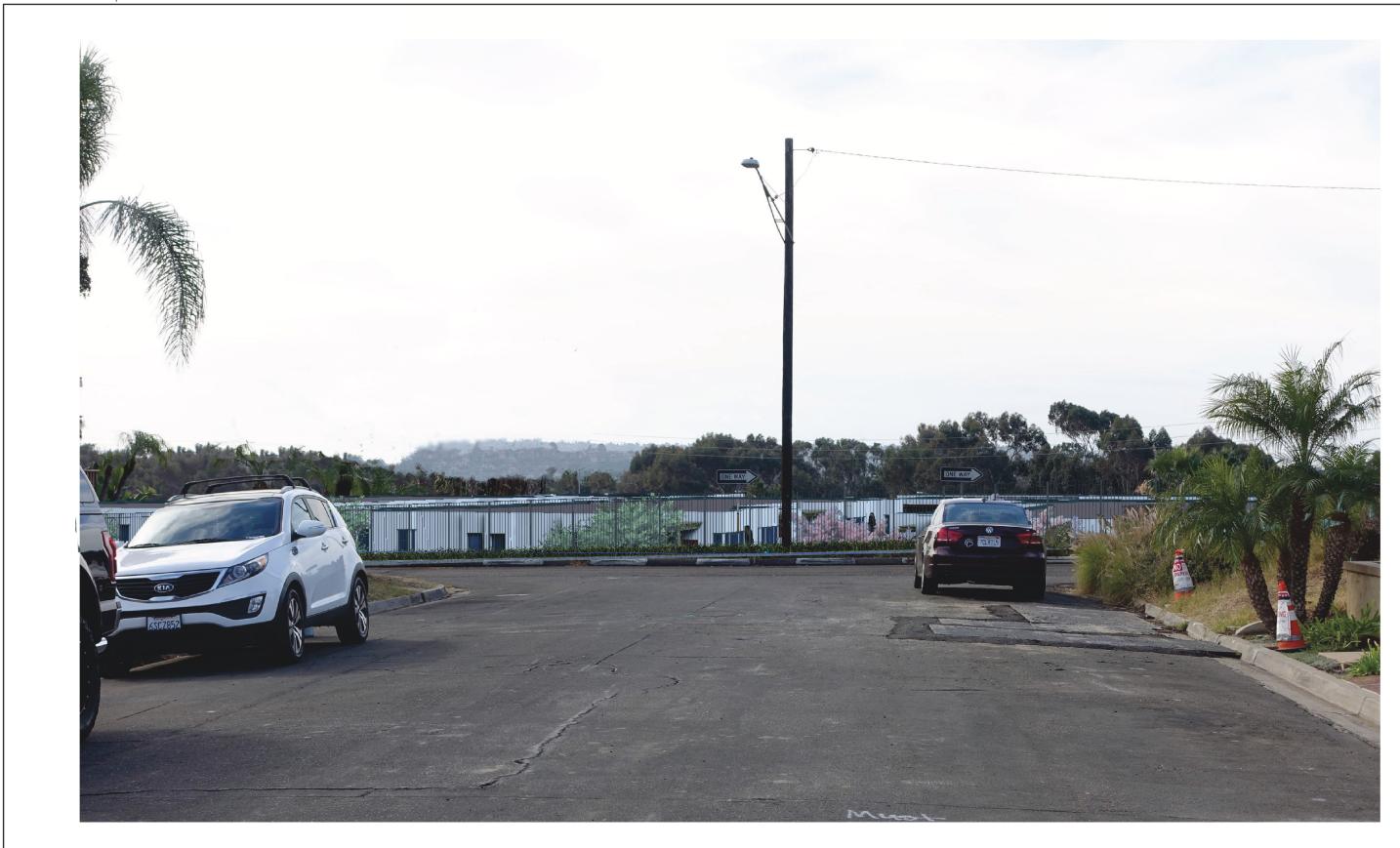
→ Viewpoint Locations

FIGURE 4.7-2

Viewpoint Locations



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Additionally, the project site is located in an area that is currently surrounded by development. As such, the redevelopment of the project site would not open up the area for new development that would ultimately cause extensive view blockage.

4.7.4.2 Significance of Impacts

The project would not result in significant impacts to public views based on the Significance Threshold 1 identified above. The project would not result block a view through a designated public view corridor as identified in the CMCP or block any public viewing area resulting in a blockage of a public resource. The project would not exceed height and bulk regulations resulting in view blockage. Additionally, the project would not open up a new area for development, and therefore would not result in cumulative view blockages (see also Section 7.7 for a discussion of cumulative visual effects). Therefore, impacts would be less than significant.

4.7.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.7.5 Issue 2: Development Features

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

4.7.5.1 Impacts

The analysis of impacts in this section addresses Significance Determination Threshold 4 as detailed in Section 4.7.3, above.

The project would not result in a disorganized appearance as the site would be developed and improved with modern structures that are consistent with the CMCP height regulations and the City's Land Development Code with deviations. The required deviations are as follows:

- Deviation to allow for carports and trash enclosures to encroach approximately 2 feet into the northern property line setback (at the slope below Tonopah Avenue)
- Deviation to allow the current roadway width of Tonopah Avenue to be maintained
- Deviation from the retaining wall height regulations
- Deviation to the setback regulations to allow the clubhouse building to encroach into the front yard setback along Morena Boulevard and to allow Building #6 (see Figure 3-1) to encroach into the side yard setback along Morena Boulevard
- Deviation from the 7-foot horizontal dimension requirement for outside assigned unit storage to account for proposed tenant storage within the building envelope.

The first three deviations listed above are proposed to account for the unique site conditions that exist at the northeastern project boundary due to the steep slope adjacent to Tonopah Avenue. At this location, an 18-foot-high split face block retaining wall with an additional 42 inches of cable guardrail fencing would be installed to support the existing slope. Refer to Figure 3-5 for a depiction

of the proposed wall with landscaping. Figure 3-7 depicts a cross section of this wall at scale with the proposed buildings. While the height of this retaining wall requires a deviation from the Land Development Code, the wall would not be visible to surrounding properties because it would be visually blocked by the slope it is intended to support to the north and would be screened by the proposed multi-family structures as viewed from surrounding roadways. Further, all retaining walls would be screened by landscaping to provide visual interest. Similarly, the deviation to allow carports and trash enclosures to encroach approximately 2 feet into the northern property line setback would not adversely affect any neighboring properties or be visually displeasing because the setback encroachment would be located adjacent to the existing slope and proposed retaining wall and would not change the visual appearance or bulk of the structures from adjacent properties due to the location of the slope. The deviation to allow the current width of Tonopah Avenue to remain would result in the existing width of the road remaining the same as the existing condition. Widening is not feasible due to the existing slope constraints. The deviations to the setback regulations to allow the clubhouse and Building #6 to encroach into the front and side yard setbacks along Morena Boulevard are required to accommodate a 5-foot separation from the face of the curb to the existing 8-inch sewer mains in Morena Boulevard. However, this deviation would not affect the visual appearance of the project from the public right-of-way or reduce any available parkway widths. This essentially provides a wider road right of way, increasing the travel way by 4 to 5 feet along the project frontage to accommodate the sewer line. This shifting of the sidewalk location toward the development area required creation of a tiered retaining wall between the sidewalk and the development area. Like all of the retaining walls, this wall would be landscaped.

The final deviation to allow assigned unit storage to be located within the building envelope (garage) instead of an outdoor area would not result in negative aesthetic impacts because residents will have an adequate storage area that would be contained within private garages. A detailed discussion of potential impacts associated with the deviations is provided in Section 4.1.5.1. As concluded therein, Impacts associated with the proposed deviations would be less than significant.

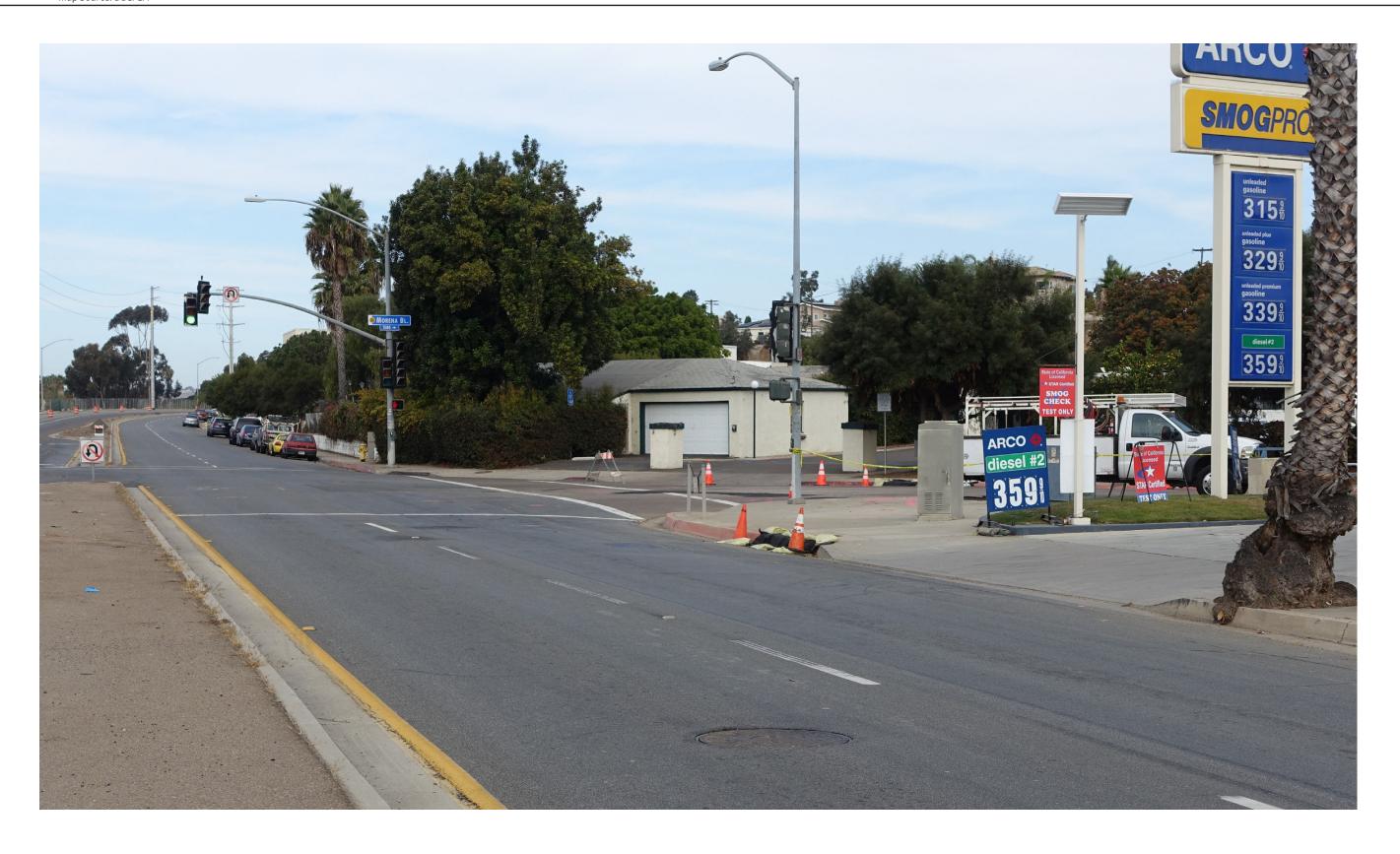
The existing condition of the site currently has a disorganized appearance that would be removed and developed with one consistent architectural theme and character, with a consistent landscape palette. Two existing views of the project site from Morena Boulevard (represented as Viewpoint 2 and Viewpoint 3) are provided on Figures 4.7-4a and 4.7-5a. As shown in Figure 4.7-4a, a single-family residence, parked cars, and inconsistent fencing and landscaping are visible on the project site from Morena Boulevard in the existing condition. The same viewpoint in the proposed condition is represented on Figure 4.7-4b. As shown in this Figure, the proposed buildings are visible behind update street trees and a landscaped public right of way with consistent fencing.

The existing view of the project site looking northwest from Morena Boulevard is shown in Figure 4.7-5a. As shown in this Figure, an existing garage and driveway entrance dominates the view at the corner. Landscaping screens the views of the internal portions of the project site from this location and retaining walls and chain link fencing is visible. This same viewpoint in the proposed condition is represented on Figure 4.7-5b. The proposed view from this location represents a more consistent and cohesive design compared to the existing condition. With the driveway at this location being removed, the frontage would have a more organized and consistent appearance with a cohesive landscaping design, street trees and views of the proposed building architecture. An



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additional view of the project site along Tonopah Avenue is provided in Figures 4.7-6a (existing) and 4.7-6b (proposed). As shown, a new sidewalk, landscaping and street trees would enhance the visual aesthetic of the site compared to the existing condition.

Renderings of the project are also provided in Figures 4.7-7a and 4.7-7b. As shown, the development would have a consistent architectural theme and would provide architectural interest with varying heights between the clubhouse and the apartments, building articulation along street frontages, and other architectural features that would avoid a monotonous visual experience. Exterior finishes include exterior stucco walls with earthen colors, wood window trellis, metal exterior doors/French doors, metal balcony railings. The clubhouse would be of similar architectural style and finish (but as a single story). Landscaping is proposed throughout the project site and along street frontages that would further create visual interest and soften the architectural elements of the project. All of these project features would ensure compatibility with the surrounding environment and would not conflict with the height, bulk, or coverage regulations of the zone (see Section 4.7.6 for a more detailed discussion of the project's height, bulk and scale in terms of the project's consistency with neighborhood character).

4.7.5.2 Significance of Impacts

The project would not result in significant impacts related to development features based on Significance Threshold 4 identified above. The project would not create a disorganized appearance or conflict with the height, bulk, and coverage regulations. Retaining walls would be screened from public view, and the project would not create an exceedingly monotonous visual environment. Therefore, impacts related to the project's development features would be less than significant.

4.7.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.





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4.7.6 Issues 3, 4 and 5: Neighborhood Character

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

Would the project cause a substantial alteration to the existing or planned character of the area?

Would the project result in the loss of a distinctive landmark as identified in the community plan?

4.7.6.1 Impacts

The analysis of impacts in this section addresses Significance Determination Threshold 2 as detailed in Section 4.7.3, above.

The project would be consistent with the CMCP height restriction of a maximum building height of 30 feet. Along the Morena Boulevard corridor, most buildings are single- or two-story, with one, three-story office building located opposite Frankfort Street. Additionally, there are existing multifamily developments in the surrounding area. While the project would include deviations from the Land Development Code, those deviations would not result in any negative aesthetic impact as discussed in Section 4.7.5.

There is no unifying style of development in this area as there are a diversity of land uses of varying ages and states of upkeep. For example, there is an existing ARCO gas station across the street from the project site and a Circle K convenience store. West of Morena Boulevard is the LOSSAN Rail Corridor and I-5. North of the project site along Morena Boulevard are some commercial buildings with an industrial building style. Single-family residences are located across the street from the project site along Frankfort Street. These homes are a mix of slightly to heavily modified minimal traditional and small ranch style homes. Refer to Figure 4.7-6a for views of the existing single-family residential homes in this location and the existing RV Park across the street. As shown in Figure 4.7-6a, the existing RV Park is set up on a berm above street level.

These residences along Tonopah Avenue would be the land use with the most sensitivity to changes in neighborhood character. The three story multi-family development would provide a higher density and bulkier character compared to single-family residential land uses; however, the project would be consistent with height and bulk regulations and would be consistent with the overall neighborhood character that provides a diversity of land uses. The project would include grading to level the site which would remove the existing raised berm along Tonopah and bring the ground level of the buildings would be below street grade, which would reduce visibility of the proposed structures from Tonopah Avenue. As a result, the visual bulk of the proposed buildings along Tonopah Avenue would be minimized and the proposed buildings appear two stories in this location (see Figure 4.7-6b).

Compared to the existing condition, the project would add consistency of architecture, landscaping and frontage improvements to the project site that would enhance the overall visual quality of the neighborhood compared to the existing RV Park. Neighborhood compatibility would be enhanced by the installation of sidewalks, landscaping and street trees.

The project site is located at a highly visible location; however, the project design is intended to provide a visual pleasing development that would enhance the Morena Corridor. The project has been designed to locate the common recreational areas including the pool and clubhouse adjacent to the project frontage which would reduce the overall height and bulk of the project as viewed from Morena Boulevard and West Morena Boulevard. As shown in Figure 4.7-2b, the height of the clubhouse is reduced compared to the apartment buildings and the location of the pool at the frontage reduces the apparent bulk of the residential structures. The varied architectural elements (discussed in in Section 4.7.5), would enhance the visual quality and character of the site.

Views of the project site from the immediate area including surrounding residences would change from a view of the Coastal Villa RV Park to a modern apartment complex with streetscape and landscape improvements. The existing RV park and all associated infrastructure, signage, or landscaping is not considered historic or known as a landmark. Therefore, demolition of structures and infrastructure on the project site would not isolate or degrade an existing landmark.

4.7.6.2 Significance of Impacts

The project would not result in significant impacts related to neighborhood character/architecture based on Significance Threshold 2 identified above. The project would be consistent with and would contribute to the character of the project area be removing an aging RV park and replacing it with a multi-family development that meets current design requirements and landscape standards. Therefore, neighborhood character impacts would be less than significant. Additionally, the project would not open up a new area for development or change the overall character of the area, and therefore would not result in cumulative effects to the neighborhood character (see also Section 7.7 for a discussion of cumulative visual effects).

4.7.6.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.7.7 Issue 6: Landform Alteration

Would the project result in a substantial change in the existing landform?

4.7.7.1 Impacts

The analysis of impacts in this section addresses Significance Determination Threshold 3 as detailed in Section 4.7.3, above.

The project would require 10,500 cubic yards of cut at a maximum depth of 9 feet and 11,800 cubic yards of fill at a maximum depth of 7 feet. Although the project would alter more than 2,000 cubic yards of earth, the project would not exceed Significance Threshold 3 because the additional four required conditions are not met.

(1) Project grading would not disturb slopes in excess of 25 percent and (2) would not create manufactured slopes in excess of 10 feet high or steeper than the 2:1 slope gradient. The project

would install 8-foot-high manufactured fill slopes at 2:1 slope gradient along Morena Boulevard and 4-foot-high manufactured fill slopes at a 2:1 slope gradient along Frankfort Street. Both these fill slopes will have a retaining wall that will be screened by landscaping and trees. The retaining wall below Tonopah Avenue would allow the slope to be largely avoided. (3) The project site would not result in a change in elevation of steep hillsides. The site is required to be graded to flatten the site and raise it outside of the floodplain. (4) The project design does not include mass terracing. Therefore, the project's proposed landform alteration/grading would not exceed the significance threshold.

4.7.7.2 Significance of Impacts

The project would not result in significant impacts related to landform alteration/grading based on Significance Determination Threshold 3 identified above. Impacts would be less than significant.

4.7.7.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.7.8 Issue 7: Light or Glare

Would the project cause a substantial light or glare which would adversely affect daytime or nighttime views in the area?

4.7.8.1 Impacts

The analysis of impacts in this section addresses Significance Determination Threshold 3 as detailed in Section 4.7.3, above. The project site is currently developed. Current sources of light on-site include the RV park street lighting, office, laundry, storage areas, individual RVs, and the existing duplexes and single-family residences. Temporary construction lighting would be limited to daylight hours. At operation, proposed lighting for the project would provide a unifying theme to the entire site that would complement the architectural design. Parking areas, pedestrian walkways, landscaping, and architectural features would be illuminated and accented with lighting for enhanced security and safety. As with the existing condition, the site will be screened by intervening walls and landscaping that shields light to and from the public roadway and the residents living within the complex. Additionally, the project would conform with the City's Land Development Code (Sections 142.0740 and 142.0730), intended to design projects to minimally impact the nighttime sky.

4.7.8.2 Significance of Impacts

The project would not emit or reflect a significant amount of light or glare and would not result in significant lighting and glare impacts.

4.7.8.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.8 Health and Safety/Hazardous Materials

This section addresses impacts related to health and safety including exposure to wildfire, hazardous materials, and interference with emergency response plans. Additionally, this section evaluates the potential for public safety impacts associated with the project site's proximity to the San Diego International Airport (SDIA). The impact analysis is based on a Phase I Preliminary Environmental Site Assessment (ESA) prepared by Advantage Environmental Consultants LLC dated September 18, 2015 (Appendix E) and secondary source information from public hazardous materials databases, adopted fire hazard mapping, and the SDIA Airport Land Use Compatibility Plan (ALUCP) (San Diego County Regional Airport Authority [SDCRAA] 2014).

4.8.1 Existing Conditions

4.8.1.1 Wildfire Risk

Potential wildfire risk zones are areas that have steep slopes, limited precipitation, and vegetation fuel on-site or within adjacent areas. The project site is developed with limited on-site or adjacent vegetation. Additionally, the project site is not located within a very high fire hazard severity zone (VHFHSZ) as mapped on California Department of Forestry and Fire (CAL FIRE) Fire Hazard Severity Zone maps.

4.8.1.2 Hazardous Materials

Phase I ESA Results

The Phase I ESA prepared for the project site included a review of information and documents pertaining to the site, an evaluation of federal, state, and local databases, a site reconnaissance of the subject property and surrounding areas, interviews, a review of prior reports, aerial photographs, and topographic, geologic, and hydrogeologic maps. The Phase I ESA found no evidence of any recognized environmental conditions in connection with the project site. The results of the Phase I ESA are summarized below.

Database Evaluation

An environmental database record search was completed for the project site and surrounding areas to identify information pertaining to documented and/or suspected releases of regulated hazardous substances and/or petroleum products within specified search distances (up to one mile). The records search determined that the project site was not identified on any of the environmental databases. A total of three potential hazardous materials locations were identified within a quartermile radius of the project site. The listed facilities are summarized below.

- Arco #5141 Golden Bear Fuel is located at 1550 Morena Boulevard, approximately 0.004-mile south-southwest from the project site. The property was cited under multiple databases regarding contamination of groundwater and soil from gasoline, hydraulic oil, and diesel. The case(s) were closed in 2005.
- 2. **Rock Engineering** is located at 1434 Morena Boulevard, approximately 0.118-mile south-southeast from the project site. The property was referenced to have a small quantity of generator hazardous waste; however, no violations were found.
- 3. **Blue Porpoise Marine** is located at 1244 Knoxville Street, approximately 0.170-mile south-southeast from the project site. The property was cited for a gasoline leak into the groundwater and the case was closed as of March 12, 1991.

The properties listed above were not considered to be environmental concerns to the project site because of the distance and orientation between the off-site properties and the project site, direction of groundwater flow, and the case status.

Site Reconnaissance

A physical inspection of the project site was conducted on August 21, 2015. No evidence of damage, staining, corrosion, or leaks were observed around the following potentially hazardous items:

- Common maintenance products, i.e., gasoline containers (in the storage building)
- Propane tanks attached to the recreational vehicles (RVs) and trailers parked on-site
- PCB containing equipment (electrical transformers)
- Solid waste (non-hazardous) disposal areas, i.e., dumpsters

Prior Reports

The project site is currently developed with seven single-story buildings. A review of a prior environmental assessment report indicates that asbestos-containing materials (ACMs) are present within select structures that would require surveys and abatement prior to demolition. In addition, a prior geotechnical report noted the presence of a water well on-site. The current field survey did not observe any water wells on-site; however, if one is discovered during future grading activities, the well would require proper abandonment in accordance with local and state regulations.

4.8.1.3 Emergency Response/Evacuation

The San Diego Emergency Plan was adopted by the City Council in June 1974 subsequent to the City Council enacting the Emergency Services Ordinance in February of 1974. The plan provides for the effective mobilization of all the resources of San Diego, both public and private, to meet any condition constituting a local emergency and provide for the organization, powers and duties, services, and staff of the emergency organization. The purpose of the plan is to:

• Provide a basis for the conduct and coordination and the management of critical resources during emergencies.

- Establish a mutual understanding of the authority, responsibilities, functions, and operations of civil government in San Diego during an emergency.
- Provide a basis for incorporating emergency organization into those non-governmental agencies and organizations having resources necessary to meet foreseeable emergency requirements.

During peacetime and wartime emergencies, the emergency plan sets forth operational concepts and schedules, and assigns tasks and responsibilities to each of the units of the emergency organization. The plan takes effect if:

- A state of war emergency exists.
- The governor has proclaimed a state of emergency in an area including San Diego.
- The mayor or the director of emergency services orders, provided that the existence or threatened existence of a local emergency has been proclaimed in accordance with the provisions of the Emergency Services Ordinance.

The Office of Emergency Services coordinates the overall county response to disasters and is responsible for alerting and notifying appropriate agencies when disaster strikes, coordinating all agencies that respond, ensuring resources are available and mobilized in times of disaster, developing plans and procedures for response to and recovery from disasters, and developing and providing preparedness materials for the public.

4.8.1.4 SDIA Land Use Compatibility Plan

Airport land use compatibility plans establish policies to promote compatibility between airports and the land uses that surround them. Compatibility plans serve as a tool by the Airport Land Use Commission (ALUC) in fulfilling their duty to review proposed development plans for airports and surrounding land uses. Additionally, compatibility plans set criteria applicable to local agencies in their preparation or amendment of land use plans (such as general plans) and ordinances regarding the design of new development. The SDCRAA is the responsible ALUC for all 16 airports within San Diego County.

The SDCRAA prepared and adopted the 2014 SDIA ALUCP, intended to ensure compatibility between adjacent land uses and the operation and/or expansion of the airport. The ALUCP is also responsible for safeguarding the general public by designating Airport Influence Areas (AIA) as it relates to airport-related noise and safety, identifying airspace protection measures, and restrictions on land use within the airport's vicinity. ALUCP implementation from a project-level perspective would reduce adverse aircraft noise impacts, limit the risk of exposures to an aircraft disaster, and ensure air navigation is free of obstructions. Per state law, the City of San Diego (City) is required to comply with SDCRAA policies and restrictions set forth in the SDIA ALUCP. The project site is located within the AIA Review Area 2 for the SDIA.

4.8.2 Regulatory Framework

4.8.2.1 Fire Code

The project is subject to the California Fire Code (CFC; 2010) as adopted by the City (San Diego Municipal Code Section 55.0101, et seq.) The Fire Code provides regulatory direction for the maintenance of brush management zones, access road standards, placement of fire hydrants, and numerous other design and maintenance requirements for development projects. With respect to construction and demolition activities, Chapter 33 of the CFC outlines general fire safety precautions for all structures and all occupancies during construction and demolition operations. In general, these requirements seek to maintain required levels of fire protection, limit fire spread, establish the appropriate operation of equipment and promote prompt response to fire emergencies. Features regulated include fire protection systems, fire fighter access to the site and building, means of egress, hazardous materials storage, and use and temporary heating equipment and other ignition sources.

4.8.2.2 Hazardous Materials/Substances Regulation

Numerous federal, state, and local laws and regulations regarding hazardous materials have been developed with the intent of protecting public health, the environment, surface water, and groundwater resources. Over the years, the laws and regulations have evolved to deal with different aspects of the handling, treatment, storage, and disposal of hazardous substances.

- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, also known as "Superfund," and the Superfund Amendments and Reauthorization Act (SARA) of 1986 (amended CERCLA, SARA Title III). CERCLA, SARA Title III provide a federal framework for setting priorities for cleanup of hazardous substances releases to air, water, and land. This framework provides for the regulation of the cleanup process, cost recovery, response planning, and communication standards.
- Federal Resource Conservation and Recovery Act of 1976. This act established the authority of the U.S. Environmental Protection Agency (EPA) to develop regulations to track and control hazardous substances from their production, through their use, to their disposal.
- The California Division of Occupational Safety and Health Administration (Cal-OSHA) and federal OSHA define and enforce worker safety standards and require proper handling and disposal of hazardous materials according to OSHA and EPA and regulations.

These acts established the authority of the EPA to develop regulations to track and control hazardous substances from their production, through their use, and ultimately to their disposal. These acts also provided a framework for setting priorities for cleanup of hazardous substances and set the precedent for states and local authorities to do the same. Applicable regulatory agencies have kept records on hazardous materials storage, use, and disposal, and make these lists publicly available. Locally, these include the San Diego County Environmental Assessment Listing and the State Department of Toxic Substances Control List.

The San Diego Fire Department screens inventories of substances and inspects sites annually. The County Health Department screens inventories, inspects facilities every 15 months, and reviews Hazardous Materials Business Plans (required for businesses handling hazardous materials), and the SDAPCD evaluates projects for possible toxic emissions and issues permits as necessary.

In regard to worker safety, the federal and state OSHA regulate emissions standards and handling procedures for workers coming into potential contact with hazardous materials. These regulations ensure that safety standards and potential risks, for example to asbestos or lead exposure, are considered and remediated in accordance with the National Emissions Standards for Hazardous Air Pollutants, OSHA, and other applicable state and local regulations.

4.8.3 Significance Determination Thresholds

The following criteria are used by the City to determine significance under California Environmental Quality Act related to hazardous materials/public safety.

A project would have a significant environmental impact associated with hazardous materials if:

- 1. The project proposes the handling, storage and treatment of hazardous materials, e.g., a Hazardous Waste Facility, falling under Municipal Code Section 141.1001 Hazardous Waste Research Facilities and Section 141.1002.
- 2. The project site is located on or near known contamination sources.
- 3. The project site meets one or more of the following criteria:
 - Located within 1,000 feet of a known contamination site.
 - Located within 2,000 feet of a known-border zone property (also known as a "Superfund" site) or a hazardous waste property subject to corrective action pursuant to the Health and Safety Code.
 - County Department of Environmental Health (DEH) site file closed. These cases are
 especially important where excavation (e.g., sewer/water pipeline projects, below grade
 parking, basements) is involved.
 - Located in Centre City San Diego, Barrio Logan or other areas known or suspected to contain contamination sites.
 - Located on or near an active or former landfill.
 - Located on a site presently or previously used for agricultural purposes.
- 4. The project site has been historically developed with industrial or commercial uses which involved dewatering (the removal of groundwater during excavation), in conjunction with major excavation in an area with high groundwater (such as downtown).

5. The project site is located in a designated airport influence area and where the Federal Aviation Administration (FAA) has reached a determination of "hazard" through FAA Form 7460- 1, "Notice of Proposed Construction or Alteration" as required by FAA regulations in the Code of Federal Regulations (CFR) Title 14 §77.13 or the proposed use is inconsistent with an Airport's Land Use Compatibility Plan (ALUCP).

Additionally, impacts associated with public health and safety may be significant if the project would:

- 6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- 7. Be located in a brush fire hazard area, hillside, or an area with inadequate fire hydrant services or street access.

4.8.4 Issue 1: Wildland Fires

Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

4.8.4.1 Impacts

The analysis of impacts under issue question 1 addresses Significance Determination Threshold 7 as detailed in Section 4.8.3, above. Placing residential land uses adjacent to or within a high fire hazard area can result in increased fire-related risk to people and structures. The project site, however, is immediately surrounded by existing development and is not located within a VHFHSZ.

The project would be designed to be consistent with the CFC, as adopted by the City. Proposed buildings would be constructed with fire-resistant construction materials and a protective system of sprinklers for residential construction.

The main access road to the project site would be via a driveway off West Morena Boulevard and Frankfort Street. Internal project roadways and a fire lane would be constructed per the City Fire Marshal's Standards and would provide adequate access throughout the project site. This includes a 26-foot-wide unobstructed fire access road as required by the City. No internal dead-end roadways are proposed. Two internal fire hydrants would be installed on-site in addition to a fire hydrant located near the main project entry driveway on Frankfort Street. The project would be required to demonstrate consistency with all applicable CFC regulations and would be reviewed by the City Fire Code Official prior to permit issuance.

4.8.4.2 Significance of Impacts

The project would not result in wildland fire impacts based on the significance thresholds identified above because the project is not adjacent to wildlands and would be consistent with all relevant fire code regulations, including adequate fire hydrant services and street access. Therefore, impacts associated with risk of wildland fires would be less than significant.

4.8.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.8.5 Issue 2: Hazardous Material

Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

4.8.5.1 Impacts

The schools closest to the project site are as follows:

- University of San Diego, 5998 Alcala Park, San Diego, California 92110 1.3 miles
- Longfellow Elementary School, 5055 July Street, San Diego, California 92110 1.7 miles
- Francis Parker School, 6501 Linda Vista Road, San Diego, California 92111 2.4 miles

There are no schools located within a quarter-mile of the project site.

4.8.5.2 Significance of Impacts

The project is not located within a quarter-mile of a school. Therefore, impacts associated with hazards located within a quarter-mile of a school would be less than significant.

4.8.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.8.6 Issue 3: Emergency Plans

Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

4.8.6.1 Impacts

The analysis of impacts under issue 3 addresses Significance Determination Threshold 6 as detailed in Section 4.8.3, above. The project site is located in an existing developed area with existing access to major roads that provide routes for emergency evacuation. Primary evacuation routes consist of the major interstates, highways, and prime arterials within the City. A San Diego Emergency Plan, including an Evacuation Annex, is in place to provide for the effective mobilization of all the resources of San Diego. The project would not impair implementation of, or physically interfere with, the San Diego Emergency Plan. Additionally, the project is subject to review by the San Diego Fire Department and the San Diego Police Department to ensure compliance with applicable safety standards.

4.8.6.2 Significance of Impacts

The project would not impair or interfere with an existing emergency response or evacuation plan based on the significance thresholds identified above. The project would be designed in accordance with applicable safety standards. The project would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans. Therefore, impacts would be less than significant.

4.8.6.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.8.7 Issue 4: Hazardous Material Sites

Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?

4.8.7.1 Impacts

The analysis of impacts under Issue 4 addresses Significance Determination Thresholds 2, 3, and 4 as detailed in Section 4.8.3, above. A Phase I ESA prepared for the project site included an environmental database records search and site visit to evaluate the potential for hazardous materials concerns existing on the site. The records search determined that the project site is not classified as a hazardous material site on any environmental database. Neighboring properties located within 1,000 feet were found on the database to have a case history of hazardous material concerns. Those properties were not considered to be environmental concerns to the project site due to the distance and orientation between the off-site properties and the project site, direction of groundwater flow, and the case status. Furthermore, the site reconnaissance survey did not identify any potentially hazardous materials on the property. The project site is not located within 2,000 feet of a known-border zone property, and is not a DEH site closed file. Additionally, the project site is not located within an area suspected to contain contaminated sites or located on a site previously used for agricultural purposes.

The project site is currently a RV park, and does not have a history of industrial or commercial uses which involved dewatering in conjunction with major excavation in an area with high groundwater. Some of the existing structures on the project that would be demolished could release ACMs. All hazardous materials would be handled in accordance with Cal-OSHA requirements for employee safety and disposed of in accordance with state and county regulations.

The site reconnaissance field survey did not observe any water wells on the property; however, a prior geotechnical report did note the presence of a well on-site. If discovered, the demolition of the well has the potential to present a safety hazard and a potential groundwater hazard. If a well is discovered during future grading activities, the well would require proper abandonment in accordance with local and state regulations.

4.8.7.2 Significance of Impacts

The project would not result in a significant impact due to its location on or near a hazardous materials site based on the significance thresholds identified above. The project site is not located on or near known contamination sources. All applicable federal, state, county, and/or local standards would apply if certain hazards such as ACMs or a well were discovered on-site. Therefore, impacts associated with hazardous material sites would be less than significant.

4.8.7.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.8.8 Issue 5: Airport Influence Area Safety Hazard

Would the project result in a safety hazard for people residing or working in a designated airport influence area?

4.8.8.1 Impacts

The analysis of impacts under Issue 5 addresses Significance Determination Threshold 5 as detailed in Section 4.8.3, above. The project site is located within the AIA Overlay Zone for the SDIA, AIA Review Area 2 (SDCRAA 2014). Per the ALUCP, only airspace protection and overflight policies and standards apply within Review Area 2. The proposed height would be approximately 66 feet above mean sea level (AMSL) and would not exceed the Federal Aviation Authority (FAA) Part 77 height criteria. Specifically, projects that are proposed to be greater than 150 feet AMSL would require FAA Part 77 notification surface for SDIA. The project does not exceed the FAA notification surface for SDIA. Additionally, review by the ALUC determined that due to the height of the project (no greater than 30 feet) an ALUC consistency determination is not required.

4.8.8.2 Significance of Impacts

The project would not result in a significant impact due to its location in an airport influence safety area based on the significance thresholds identified above The project site is located within the AIA Review Area 2 and not within a safety zone as depicted in the 2014 ALUCP. The project site would not exceed the height requirement triggering a need for FAA notification. Therefore, safety hazard impacts associated with the project site's proximity to the SDIA would be less than significant.

4.8.8.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.9 Hydrology

This section addresses impacts that could occur as a result of changes in hydrological conditions on the project site. Specifically, this section evaluates the potential for impacts associated with alterations to drainage patterns and runoff flow volumes/rates, as well as potential flood hazards. The impact analysis is based on the site-specific Preliminary Drainage Report, Draft Conditional Letter of Map Revision based on Fill (CLOMR-F), and the Priority Development Project Storm Water Quality Management Plan prepared by Project Design Consultants and included as Appendices F-1, F-2, and G, respectively.

4.9.1 Existing Conditions

4.9.1.1 Existing Drainage Patterns

Under the existing condition, runoff from the project site flows to the southwest and enters the public storm drainpipe via two curb-and-gutter inlets at the intersection of Morena Boulevard and Frankfort Street (System 100) and along Morena Boulevard (System 200). Flow captured at these inlets ultimately discharge into Tecolote Creek. After entering Tecolote Creek, runoff would travel an additional several hundred feet and then discharge into Mission Bay at the Enchanted Cove near Fiesta Island. Existing drainage conditions are shown in Figure 4.9-1.

4.9.1.3 Flood Hazards

The 100-year floodplain associated with Tecolote Creek passes through the project site. Pursuant to the Federal Insurance Rate Map (FIRM), the southwestern portion of the project site lies within a Special Flood Zone Area, or Federal Emergency Management Agency (FEMA) flood area, Zone AO. Figure 4.9-2 provides the FIRM showing the demarcation of the 100-year flood zone at the project site.



FIGURE 4.9-1 Existing Drainage Conditions



Project Boundary

100-Year Floodplain

FIGURE 4.9-2 100-Year Floodplain

4.9.2 Regulatory Framework

4.9.2.1 Federal

a. National Flood Insurance Act

The National Flood Insurance Act (1968) established the National Flood Insurance Program (NFIP), which is based on the minimal requirements for floodplain management and is designed to minimize flood damage within Special Flood Hazard Areas (SFHAs). FEMA administrates the NFIP. SFHAs are defined as areas that have a 1 percent chance of flooding within a given year. This is also referred to as the 100-year flood. FIRMs were developed to identify areas of flood hazards within a community.

b. Executive Order 11988, Floodplain Management

The major requirements of this Executive Order are to avoid support of floodplain development; to prevent uneconomic, hazardous, or incompatible use of floodplains; to protect and preserve the natural and beneficial floodplain values; and to be consistent with the standards and criteria of the NFIP. The basic tools for regulating construction in potentially hazardous floodplain areas are local zoning techniques. Proper floodplain zoning can be beneficial in the preservation of open space, retention of floodplains as groundwater recharge areas, and directing of development to less floodprone areas.

4.9.2.2 Local

a. Local Drainage Design Manual

Chapter 14, Article 2, Division 2 of the San Diego Municipal Code outlines Storm Water Runoff and Drainage Regulations, which apply to all development in the City of San Diego (City), regardless of whether or not a development permit or other approval is required. In addition, drainage design policies and procedures are provided in the City's Drainage Design Manual (which is incorporated in the Land Development Manual as Appendix B). The Drainage Design Manual provides a guide for designing drainage, and drainage-related facilities for developments within the City.

b. Land Development Code - Floodplain Management

The City has adopted development regulations for SFHAs in the Land Development Code (Sections 143.0145 and 143.0146). Within the floodway, the regulations set limitations on land uses, structures, and channelization or other alteration of the river, and require passage of the base flood. Permanent structures are not allowed, and any development (e.g., road crossing) must be offset by improvements or modifications to enable passage of a base flood. Within flood fringe areas, the regulations allow permanent structures and fill for permanent structures, roads, and other development if certain conditions are met.

c. Environmentally Sensitive Lands Regulations

The project site is subject to the Environmentally Sensitive Lands (ESL) Regulations because the southern portion of the property is located within the 100-year floodplain associated with Tecolote Creek. The purpose of the ESL Regulations is to protect and preserve ESL and the viability of the species supported by those lands. Additional discussion of ESL can be found in the Section 4.1, Land Use, of this EIR.

4.9.3 Significance Determination Thresholds

The following criteria are used by the City of San Diego (City) to determine significance under California Environmental Quality Act related to hydrology.

A project would have a significant environmental impact:

- 1. If a project would result in increased flooding on- or off-site, there may be significant impacts on upstream or downstream properties and to environmental resources.
- 2. Significant impacts may result if the project would impose flood hazards on other properties or if the project proposes to develop wholly or partially within the 100-year floodplain identified in the Federal Emergency Management Agency (FEMA) maps.
- 3. If a project would grade, clear, or grub more than 1.0 acre of land, especially into slopes over a 25 percent grade, and would drain into a sensitive water body or stream, there may be significant impacts on stream hydrology if uncontrolled runoff results in erosion and subsequent sedimentation of downstream water bodies.
- 4. If a project would result in modifications to existing drainage patterns, there may be significant impacts on environmental resources such as biological communities, archaeological resources, etc.

4.9.4 Issue 1: Drainage Patterns

Would the proposal result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?

4.9.4.1 Impacts

The analysis of impacts under issue 1 addresses Significance Determination Thresholds 1 and 4 as detailed in Section 4.9.3, above. Runoff generated by the project would continue to discharge to the same aforementioned curb inlets. Gutters and on-site area drains would direct runoff into a private storm drain system that would convey flow to and from the on-site treatment Best Management Practices (BMPs) and then into the public storm drain system. The on-site system would include one large and two small biofiltration basins and three modular wetland units (Figure 4.9-3).



FIGURE 4.9-3 Post Construction Drainage Conditions

The connection to the public storm drain would be the same as in the existing condition. Under post project conditions, the runoff from approximately one acre of drainage area would shift from System 200 (the drainage area leading to the Morena Boulevard inlet) to System 100 (the inlet at the corner of Morena Boulevard and Frankfort). The Drainage Study was based on the Rational Method as presented in the City's Drainage Design Manual and was used to calculate the existing and proposed peak storm conditions. The results of the hydrology analysis revealed that flow rates would decrease in the post-construction condition from 48.5 cubic feet per second (cfs) to 45.3 cfs, resulting in a reduction in peak flow of 3 cfs. Therefore, the project would not result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes. Additionally, because the project would not result in modifications to existing drainage, no impacts to on-site resources would occur. Impacts would be less than significant.

4.9.4.2 Significance of Impacts

The project would not result in increased flooding on- or off-site based on the Significance Thresholds identified above. Post-construction peak flows would decrease by approximately 3 cfs compared to existing peak flow rates. The on-site storm drain system would be designed to adequately convey anticipated runoff to the public system which is able to support project flows. Therefore, impacts associated with alterations to drainage patterns would be less than significant.

4.9.4.3 Mitigation, Monitoring and Reporting

Impacts would be less than significant. Therefore, no mitigation is required.

4.9.5 Issue 2: Floodplains

Would the project develop wholly or partially within the 100-year floodplain identified in the FEMA maps or impose flood hazards on other properties?

4.9.5.1 Impacts

The analysis of impacts under Issue 2 addresses Significance Determination Threshold 2 as detailed in Section 4.9.3, above. As described in Section 4.9.1.3, the southern portion of the project site is located within FEMA Zone AO, which is designated as being within the 100-year floodplain (see Figure 4.9-2). Construction of the project would include a net import of approximately 1,000 cubic yards in order to increase elevations and raise all portions of the project site on which housing would be constructed out of the 100-year floodplain. Project design and construction methods to increase elevations at the project are being reviewed by FEMA, who would issue a Letter of Map Revision/CLOMR-F documenting that the project would be constructed on elevations outside of the 100-year floodplain upon approval. A draft CLOMR-F has been prepared and submitted to FEMA and is included as Appendix F-2. As detailed in Appendix F-2, the report supports a recommendation that the portion of the property identified as within a special flood hazard area be removed from the 100-year floodplain limits because the proposed mass graded condition for the project site would raise the surface elevation of the site higher than the Zone AO special flood hazard area. Once

grading is complete, a LOMR-F would be processed with FEMA to document the as-built condition after construction of the project.

4.9.5.2 Significance of Impacts

The project would not result in impacts associated with development within the 100-year floodplain based on the Significance Thresholds identified above. The project site would be elevated by fill to ensure the proposed buildings are placed above flood elevations per City and FEMA requirements. Therefore, impacts associated with flood hazards would be less than significant.

4.9.5.3 Mitigation, Monitoring, and Reporting

Impacts related to flood hazards would be less than significant. No mitigation would be required.

4.9.6 Issue 3: Runoff

Would the proposal result in a substantial increase in impervious surfaces and associated increased runoff?

4.9.6.1 Impacts

The analysis of impacts under Issue 3 addresses Significance Determination Threshold 3 as detailed in Section 4.9.3, above. As designed, the project would not result in an increase in impervious areas; the project would decrease impervious areas by approximately 16 percent (1 acre) compared to the existing condition. As discussed under Section 4.9.4.1, the project would result in a reduction in storm water flow rates, decreasing from 48.5 cfs to 45.3 cfs (approximately 3 cfs). Runoff volumes would be reduced due to project BMPs. For additional detail relating to BMPs and the design measures associated with storm water runoff, refer to Section 4.10 of this EIR.

4.9.6.2 Significance of Impacts

Implementation of the project would not increase impervious surfaces resulting in increased runoff. Impacts related to runoff would be less than significant.

4.9.6.3 Mitigation, Monitoring, and Reporting

Impacts related to an increase in runoff would be less than significant. No mitigation would be required.

4.10 Water Quality

This section addresses potential impacts to water quality that could result from implementation of the project. The section is based on information contained within the Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) for Morena Apartment Homes, prepared by Project Design Consultants and included as Appendix G.

4.10.1 Existing Conditions

4.10.1.1 Surface/Receiving Waters

The project site is located within the Mission Bay Watershed, Tecolote Creek-Frontal Mission Bay Hydrologic Subarea (906.50). The project site discharges into the public storm drain system that leads into Tecolote Creek channel, ultimately discharging into Mission Bay at the Enchanted Cove near Fiesta Island. Receiving waters from the project site include Tecolote Creek and Mission Bay. Existing beneficial uses of these receiving waters include industrial services supply, contact recreation, non-contact recreation, commercial and sport fishing, estuarine habitat, wildlife habitat, rare, threatened, or endangered species, marine habitat, and shellfish harvesting.

Tecolote Creek is listed as an impaired water body. Pollutants of concern include cadmium, copper, indicator bacteria, nitrogen, phosphorus, selenium, toxicity, turbidity, and zinc. Mission Bay is also listed as an impaired water body. Pollutants of concern include eutrophic and lead. There are no areas of special biological significance downstream of the project.

4.10.1.2 Existing Pollutant Discharge

The project site is currently developed as a recreational vehicle park with several permanent support structures. Currently, site runoff would likely include pollutants such as sediments from the undeveloped slopes along the northeastern project boundary and landscaped areas within the project site; pesticides, nutrients, and herbicides associated with landscaping; motor vehicle fluids such as oils and hydrocarbons from the recreational vehicle parking areas; and general trash and debris. There are currently no runoff treatment management practices being employed on-site to treat runoff from the existing uses. Runoff discharges into a hardline storm drain leading to Tecolote Creek, a fully concrete-lined channel, which then outfalls to Mission Bay.

4.10.2 Regulatory Framework

Various federal, state, and local regulations provide requirements for new development to control erosion and runoff contaminants, as well as direct discharge of water quality pollutants.

4.10.2.1 Federal

a. Clean Water Act

The Clean Water Act (33 United States Code [U.S.C.] §1251 et seq.; 1972) is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The Clean Water Act established basic guidelines for regulating discharges of pollutants into the waters of the U.S. and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the Clean Water Act.

Section 401 of the Clean Water Act requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility which may result in the discharge of any pollutant, must obtain certification from the state. Section 402 of the Clean Water Act established the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources, and Section 404 established a permit program to regulate the discharge of dredged material into Waters of the U.S. In California, the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Board (RWQCB) administers the NPDES permitting programs and are responsible for developing waste discharge requirements. The local RWQCB is responsible for developing waste discharge requirements specific to its jurisdiction. General waste discharge requirements that may apply to projects or recommendations contained within the Plans include the SWRCB Construction General Permit and Industrial General Permit and the regional Municipal Separate Storm Sewer System (MS4) Permit administered by the RWQCB.

Under Section 303(d) of the Clean Water Act, states, territories, and authorized tribes are required to develop lists of impaired waters that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. The law requires that these jurisdictions establish priority rankings for listed waters and develop action plans, called Total Maximum Daily Loads (TMDLs), to improve water quality.

4.10.2.2 State

a. San Diego Regional Water Quality Control Board (Water Board) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100, NPDES Permit No. CAS0109266

Under the authority of the Clean Water Act amendments and federal NPDES permit regulations, the Water Board issued this order to the Copermittees consisting of San Diego County, the 18 cities within San Diego County, the Port of San Diego, and the San Diego Regional Airport Authority. This order requires that all jurisdictions within the San Diego region prepare Jurisdictional Runoff Management Plans. Each of these jurisdictional plans must contain a component addressing construction activities and a component addressing existing development.

4.10.2.3 Local

a. Water Quality Control Plan for the San Diego Basin

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange counties. The basin is composed of 11 major hydrologic units, 54 hydrologic areas, and 147 hydrologic subareas, extending from Laguna Beach southerly to the U.S./Mexico border. Drainage from higher elevations in the east flow to the west, ultimately into the Pacific Ocean. The RWQCB prepared the Basin Plan, which defines existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body.

b. City of San Diego Jurisdictional Runoff Management Program

This document is a total account of how the City of San Diego (City) plans to protect and improve the water quality of rivers, bays, and the ocean in the region in compliance with the Water Board permit referenced above. The document describes how the City incorporates storm water best management practices into land use planning, development review and permitting, City capital improvement program project planning and design, and the execution of construction contracts.

c. Water Quality Improvement Plans

The MS4 Permit also requires development of Water Quality Improvement Plans (WQIPs) that guide the Copermittees' jurisdictional runoff management programs towards achieving improved water quality in MS4 discharges and receiving waters. The WQIPs further the Clean Water Act's objectives to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state. The requirement sets forth a collaborative and adaptive planning and management process that identifies the highest priority water quality conditions within a watershed management area and implements strategies through the jurisdictional runoff management programs of the respective jurisdictions

d. City of San Diego General Plan

The Conservation Element of the City General Plan includes citywide goals and policies on urban runoff. The Conservation Element policy relevant to the project is included below.

CE-E.2. Apply water quality protection measures to land development projects early in the process—during project design, permitting, construction, and operations—in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff.

e. City of San Diego Grading Ordinance

Construction of projects in the City is subject to the erosion control requirements of the City's Grading Ordinance.

f. Storm Water Standards Manual

The City's Storm Water Standards Manual provides information to project applicants on how to comply with the permanent and construction storm water quality requirements in the City. Significant elements of the Storm Water Standards Manual include:

- 1. Low Impact Develop (LID) Best Management Practice (BMP) Requirements
- 2. Source Control BMPs
- 3. BMPs Applicable to Individual Priority Development Project Categories
- 4. Treatment Control BMPs

The Storm Water Standards Manual addresses "Hydromodification – Limitations on Increases of Runoff Discharge Rates and Durations." Hydromodification management requirements would dictate design elements in locations where downstream channels are susceptible to erosion from increases in storm water runoff discharge rates and durations. Development projects within areas draining to water bodies would typically be exempt from hydromodification management requirements because of the location and hardened drainage systems. Projects discharging into underground storm drains discharging directly to bays or the ocean are exempt.

The Storm Water Standards Manual also provides minimum requirements for construction site management, inspection, and maintenance of construction BMPs; monitoring of the weather and implementation of emergency plans as needed; and provides minimum performance standards, including: pollution prevention measures so that there would be no measurable increase of pollution (including sediment) in runoff from the site, no slope erosion, water velocity moving off-site must not be greater than pre-construction levels, and preserve natural hydraulic features and riparian buffers where possible. The City's Storm Water Standards Manual was updated in 2016 for consistency with the Regional Best Management Practices Design Manual.

g. Storm Water Requirements Applicability Checklist

Project applicants are required to complete and submit the Storm Water Requirements Applicability Checklist (SWRAC) in order to determine the project's storm water BMPs required during construction and post-construction. The SWRAC was completed for the project and it was determined to be a "Priority Development Project."

4.10.3 Significance Determination Thresholds

The following criteria are used by the City to determine significance under California Environmental Quality Act related to water quality:

 Compliance with the Water Quality Standards is assured through compliance with the City's Storm Water Standards of the Municipal Code and Implementation of Best Management Practices (BMPs). Compliance with the water quality standards is generally considered sufficient to preclude significant impacts. However, the size and location of this project warrants an evaluation of potential impacts in spite of adherence to the standards.

4.10.4 Issue 1: Pollutant Discharge

Would the project result in an increase in pollutant discharge to receiving waters during or following construction or discharge identified pollutants to an already impaired water body?

4.10.4.1 Impacts

The analysis of impacts under Issue 1 addresses Significance Determination Threshold 1 as detailed in Section 4.10.3, above. Development of the project could result in pollutant discharge and increase in pollution levels within impaired water bodies during project construction and operation. However, prior to the issuance of any discretionary permits associated with the project (i.e., grading and construction permits) applicable NPDES permit requirements would require implementation of BMPs to ensure protection of water quality. Existing storm water regulations require certain minimum storm water requirements to protect water quality. Storm water BMPs required for new developments include source control, site design, and treatment control practices, many of which overlap with LID practices. The project would implement required BMPs as discussed below.

a. Source Control BMPs

As detailed in the SWQMP, the project would implement source control BMPs as required by the BMP Design Manual (Part 1 of the City's Storm Water Standards). Source control BMPs would include:

- Integrated Pest Management Principles
- Efficient landscape and irrigation design
- Stenciling of the private trench drainage
- Protect trash storage areas from rainfall, run on, runoff, and wind dispersal all trash areas would be fully enclosed

Additional source control BMPs may be implemented based on the following project components that could result in additional sources of runoff pollutants: on-site storm drain inlets; interior floor drains; interior parking garage; need for future indoor and structural pest control; landscape/outdoor pesticide use; pools, spas, ponds, decorative fountains, and other water features; food service; refuse areas; fire sprinkler test water; and/or plazas, sidewalks, and parking lots.

b. Site Design BMPs

As detailed in the SWQMP, the project would implement Site Design BMPs as required by the BMP Design Manual (Part 1 of the City's Storm Water Standards). The project would include the following Site Design BMPs:

- Minimize impervious areas
- Minimize soil compaction
- Impervious area dispersion
- Runoff collection (distributed treatment BMPs)

- Planting street trees with tree wells sized to capture runoff
- Green streets elements for frontage improvements
- Landscaping with native or drought-tolerant species

In addition to the aforementioned Site Design BMPs, the existing cut slope at the northerly project boundary would be landscaped with a drought-tolerant hydroseed mix that will stabilize the slope. Additionally, any erosion from the slope would be captured and retained behind the proposed retaining wall.

c. Structural or Treatment BMPs

The project site contains 14 drainage management areas (DMA). Each DMA has a structural/treatment BMP device associated with it that would treat storm water runoff within that DMA. Treatment BMPs selected for this project include three partial retention biofiltration basins and three modular wetlands. Figure 4.10-1 shows the location of each DMA within the project site and the BMP associated with each.

As detailed in the SWQMP, the general strategy for selecting and design of the proposed structural BMPs was based on Section 5.1 of the BMP Design Manual. Additionally, recommendations of no infiltration by the geotechnical engineer due to high ground water levels were considered in selecting appropriate and adequate structural BMPs. Based on spatial and grading constraints, it was determined that the project would implement three biofiltration basins and three modular wetland units. The biofiltration basins are located toward the upstream portion of the site where there is adequate slope for positive drainage. The modular wetland units would be located towards the downstream portion of the project site where the site grading is too flat to drain. The modular wetland units are a type of biofiltration system that is able to drain where minimal slope is available.

A number of DMAs are not able to be supported by the proposed biofiltration systems, especially along the driveways. Therefore, additional BMPs are included as part of the project design. Specifically, street trees would be added to DMA numbers 9 and 12 to take what runoff would be collected in the gutter. Flow associated with DMA numbers 11 and 14 would be regarded as deminimus because they make up less than 2 percent of the drainage area and the flow associated with these DMA areas would be captured by the proposed green street elements to be incorporated into public frontage improvements. Design detail for permanent project BMPS are shown in Figure 4.10-2.

The project includes source control, site design, and structural BMPs that would reduce the amount of pollutants transported from the project site to receiving waters. Additionally, since there are currently no runoff treatment management practices being employed on-site to treat runoff from the existing use, the potential water quality impacts associated with the project would be reduced compared to the existing condition.



FIGURE 4.10-1 Project Site Drainage Management Areas

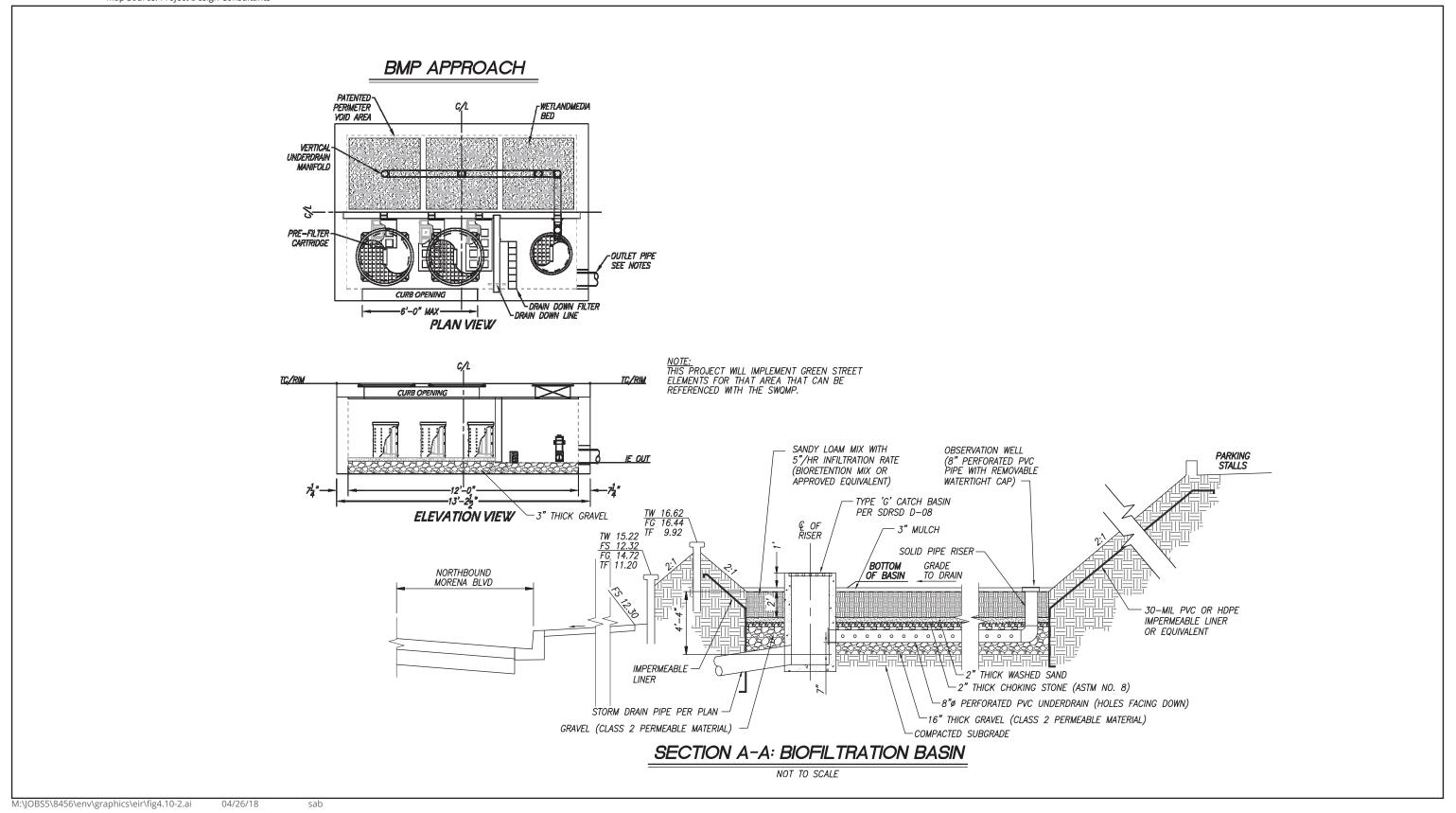


FIGURE 4.10-2 Project Permanent BMPs

4.10.4.2 Significance of Impacts

The project would not result in impacts to water quality based on the significance threshold identified above. The project incorporates features to reduce storm water discharge off-site. The project would comply with all applicable federal, state, and local water quality standards through adherence to the City's new Storm Water Standards. Implementation of the proposed BMPs would reduce pollutant discharge to receiving waters during and following construction. Therefore, impacts would be less than significant.

4.10.4.3 Mitigation

Water quality impacts would be less than significant. No mitigation would be required.

4.11 Geology and Soils

This section evaluates potential impacts that could occur due to the geological conditions of the project site. The impact analysis is based on the Preliminary Geotechnical Investigation and two Geotechnical Addendums prepared by LGC Valley, Inc. included as Appendices H-1, H-2, and H-3.

4.11.1 Existing Conditions

The project site is located near the mouth of the San Diego River and the east side of Mission Bay within the Coastal Plain region of San Diego County. The Coastal Plain region is the westernmost territory of three distinct regions of San Diego County and is characterized by Mesozoic-age basement rocks overlain by a thick sequence of Cenozoic marine and non-marine sedimentary rocks.

4.11.1.1 Existing Soils

The project site is underlain by sedimentary Pleistocene-aged Old Paralic Deposits consisting of interfingered strandline, beach, estuarine, and colluvial deposits. Subsequent to the deposition of this unit, erosion and regional tectonic uplift created the valleys and ridges of the area. Recent weathering and erosional processes have produced Quaternary-aged alluvium while human influences have created the undocumented fill soils that mantle the site. These soils are described below.

a. Undocumented Fill

Undocumented artificial fill is located over the Quaternary-aged Alluvium and Pleistocene-aged Old Paralic Deposits (Quaternary Bay Point Formation) beneath the project site. The undocumented fill onsite consists of silty sands and sandy clays derived from the alluvium and paralic deposits.

b. Alluvium (Qal)

Quaternary-aged alluvium, consisting of silty fine to coarse sands, clayey sands, and fine sandy clays, was encountered in the southeastern portion of the project site, ranging from 0 to 42 feet in depth. The maximum thickness of the alluvium on the site is estimated to be on the order of 50 feet.

c. Quaternary Bay Point Formation (Qbp)

Pleistocene-aged Old Paralic Deposits (Quaternary Bay Point Formation) consisting mainly of poorly sorted, orange to reddish-brown, silty fine to coarse sand, gravelly sands and sandy to gravelly conglomerates, were encountered beneath the alluvium in the southeastern portion of the site and at grade in the northern portion of the site. Based on the subsurface investigation and review of geologic maps of the general project vicinity and professional experience of LGC Valley, Inc., the Old Paralic

Deposits are generally massive to thickly bedded. Furthermore, bedding within the unit ranges from flat lying to dipping less than 5 to 8 degrees to the west and, therefore, is not considered significant from a geotechnical perspective.

4.11.1.2 Groundwater

Groundwater was encountered in three of the borings excavated on the project site to a depth of approximately 6 to 14 feet below the existing ground surface (or at an approximate elevation of 7 to 9 feet above mean sea level). Although data indicating the depth to the historical high ground water level at the project site was unavailable, the groundwater level as encountered in these borings is relatively close to the historical high ground water level based on the close proximity of the site to Mission Bay. In general, groundwater levels in alluvium fluctuate with seasonal variations and local zones of perched groundwater may occur within near-surface deposits when precipitation is high.

4.11.1.3 Faults

The project site is located within the seismically active southern California region. This seismic activity results from a number of active faults that cross the region, all of which are related to the San Andreas transform system, a broad zone of right lateral faults that extends from Baja California to Cape Mendocino, approximately 200 miles north of San Francisco. No known active faults traverse the project site, and the property is not within a currently established Alquist-Priolo earthquake fault zone for fault rupture hazard. However, strands of the Rose Canyon fault zone have been mapped approximately 150 feet northeast of the project site. Active faults in the region that could possibly affect the project site include the Coronado Bank fault zone located 11.5 miles southwest, the San Diego Trough fault zone located 23.5 miles southwest, and the Elsinore fault zone located approximately 40 miles northeast.

4.11.1.4 Geologic Hazards

Based on the Seismic Safety Study maps (City of San Diego 2008), the southern and western portion of the project site is within Geologic Hazards Category 31, and the remainder of the project site is within Category 53. Category 31 denotes potential liquefaction and a high potential of risk, such as areas with shallow groundwater, major drainages, and hydraulic fills. Category 53 is assigned to level or sloping terrain with unfavorable geologic structure and has a low to moderate risk potential.

4.11.2 Regulatory Framework

4.11.2.1 California Building Code

Slope instability or erosion problems in the City of San Diego (City) are primarily regulated through the California Building Code (CBC) and the City's Grading Ordinance (see below). The CBC requires special foundation engineering and investigation of soils on proposed development sites located in geologic hazard areas. These reports must demonstrate either that the hazard presented by the project will be eliminated or that there is no danger for the intended use. The CBC also contains design and construction regulations pertaining to seismic safety for buildings. These regulations cover issues such as ground motions, soil classifications, redundancy, drift, and deformation compatibility.

4.11.2.2 City of San Diego Land Development Code

The City's Grading Ordinance is located within the Land Development Code as Section 142.0101. The purpose of the City's grading regulations is to address slope stability, protection of property, erosion control, water quality, and landform preservation and to protect the public health, safety, and welfare of persons, property, and the environment. To reduce slide danger and erosion hazards, a grading permit must be obtained for all projects involving the process of moving soil and rock from one location to another. The Grading Ordinance is designed in part to assure that development in earthquake- or landslide-prone areas does not threaten human life or property.

4.11.3 Significance Determination Thresholds

The following criteria are used by the City of San Diego (City) to determine significance under California Environmental Quality Act related to geology. A project would have a significant environmental impact:

- 1. If the project would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.
 - · Strong seismic ground shaking.
 - Seismic-related ground failure, including liquefaction.
 - Landslides.
- If the project would result in substantial soil erosion or the loss of topsoil.
- 3. If the project is located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
- 4. If the project would 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.

4.11.4 Issue 1: Geologic Hazards

Would the project expose people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

4.11.4.1 Impacts

The analysis of impacts under issue 1 addresses Significance Determination Threshold 1 as detailed in Section 4.11.3, above.

a. Earthquake

As described in Section 4.11.1.3, no known active faults traverse the project site, and the property is not within a currently established Alquist-Priolo earthquake fault zone for fault rupture hazard. Consequently, the potential for the project site to be exposed to fault rupture is low. However, the project site could be subjected to moderate to severe ground shaking in the event of an earthquake along any of the faults described above in Section 4.11.1.3. Potential impacts associated with earthquake ground shaking would be reduced to less than significant by adherence to the recommendations presented in the Preliminary Geotechnical Investigation prepared for the project and compliance with applicable CBC regulations.

b. Landslides

Based on the relatively flat nature of the property, the bedrock bedding of the soils, and review of the geologic literature pertinent to the project site, the geotechnical evaluation determined that there are no potential landslide areas on the project site or in the surrounding areas that could impact the project site. An existing 2:1 cut slope is present along the northeastern project boundary; however, the Geotechnical Investigation found that the slope is comprised of materials that would have a low potential for landslide. Additional discussion of the surficial stability of this slope is discussed in Section 4.11.5.1.

c. Liquefaction

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: (1) shallow groundwater; (2) low density non-cohesive (granular) soils; and (3) high-intensity ground motion. Liquefaction is typified by a buildup of pore-water pressure in the affected soil layer to a point where a total loss of shear strength occurs, causing the soil to behave as a liquid. Studies indicate that saturated, loose to medium dense, near surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential. As described in Section 4.11.1.4, the southern and western portion of the project site are located within an area identified by City Seismic Safety Study maps as category 31, which denotes high potential risk for liquefaction. A site-specific liquefaction analysis was completed for the project site and is included as an appendix to the Geotechnical Investigation (see Appendix H-1). Groundwater was encountered in geotechnical excavations at depths ranging from 6 to 14 feet below the existing site grades; and the highest historic groundwater level for the site is anticipated to be between approximately 5 to 10 feet below the surface. The liquefaction analysis used information collected from site excavations in addition to laboratory test results to determine if the fine grained soils (clays) are susceptible to liquefaction. The liquefaction analysis conducted as part of the Preliminary Geotechnical Investigation determined that the potential for liquefaction to occur on the project site is low.

d. Tsunamis and Seiches

Review of the Tsunami Inundation Map for Emergency Planning – La Jolla Quadrangle available from the State Department of Conservation, California Geologic Survey Information Warehouse determined that

the project site is not located within the mapped tsunami inundation zone. Thus, the potential for the project to be impacted by tsunami or seiche is considered low.

4.11.4.2 Significance of Impacts

The project would not expose people or structures to impacts associated with earthquakes, liquefaction, landslides, or tsunamis/seiches based on the significance thresholds identified above. Adherence to the recommendations presented in the Preliminary Geotechnical Investigation prepared for the project and compliance with applicable CBC regulations would ensure that impacts related to geologic hazards would be less than significant.

4.11.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.11.5 Issue 2: Erosion

Would the project result in a substantial increase in wind or water erosion of soils, either on or off the site?

4.11.5.1 Impacts

The analysis of impacts under issue 2 addresses Significant Determination Threshold 2 as detailed in Section 4.11.3, above. Implementation of the project is not anticipated to result in substantial soil erosion or loss of top soil, because redevelopment of the project site would comply with existing landscape regulations that require soil stabilization and erosion prevention measures. The project would implement construction BMPs consistent with the City's Storm Water Standards Manual described in Section 4.10 that would control storm water runoff and implement water quality protection measures. Grading activities would be required to comply with erosion control measures pursuant to the City's Grading Ordinance, which requires implementation of:

- Desilting basins, improved surface drainage, or planting of ground covers required early in the improvement process in areas that have been stripped of native vegetation or areas of fill material.
- Short-term measures such as sandbag placement and temporary detention basins.
- Catch basins.
- Restrictions on grading during the rainy season (November through March), depending on size of the grading operation, and on grading in proximity to sensitive wildlife habitat.
- Immediate post-grading slope revegetation or hydroseeding with erosion-resistant species to ensure coverage of the slopes prior to the next rainy season in accordance with Revegetation and Erosion Control Requirements found in Section 142.0411 and Table 142-04F of the Land Development Code, Landscape Regulations. All required revegetation and erosion control is required to be completed within 90 calendar days of the completion of grading or disturbance (Land Development Code 142.0411 [c]).

The existing 2:1 cut slope is present along the northeast project boundary and has existing surficial stability issues consisting of minor to moderate rilling of the slope. At the base of this slope, the project design includes installation of a block retaining wall with a maximum exposed height of 18 feet and an additional 2-foot cable guard rail atop. This retaining wall design would create a catchment area behind the wall to contain erosion and debris material. Additionally, the slope would be planted with appropriate vegetation to minimize future erosion and would be covered with a jute mesh or other erosion control materials. Conformance to mandated City grading requirements and Preliminary Geotechnical Investigation recommendations regarding the northern slope would ensure that adverse impacts related to soil erosion are avoided.

4.11.5.2 Significance of Impacts

The project would not result in substantial soil erosion or the loss of topsoil based on the significance thresholds identified above. Adherence to the City's Grading Ordinance, CBC, and implementation of the recommendations presented in the Preliminary Geotechnical Investigation would ensure that impacts associated with erosion would be less than significant.

4.11.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.11.6 Issue 3: Unstable Geologic Units or Soils

Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the proposal, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? Would the project 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?

4.11.6.1 Impacts

The analysis of impacts under issue 3 addresses Significance Determination Thresholds 3 and 4 as detailed in Section 4.11.3, above. As described in Section 4.11.4.1, the Preliminary Geotechnical Investigation determined that there are no potential landslide areas on the project site or in the surrounding areas that could impact the project site. Similarly, the Preliminary Geotechnical Investigation did not identify any potential impacts related to lateral spreading or collapse, and determined that the potential for the project to be impacted by liquefaction is considered low. The potential for dry sand settlement would be negligible, and seismic settlement below groundwater from liquefaction could be minimized through adherence to design recommendations presented in the Preliminary Geotechnical Investigation. The project site was identified to have a medium expansive soil potential and the only recommendation related to the expansiveness of the soil was in regard to the design of the proposed pool and decking. The Geotechnical Investigation recommended that all concrete in contact with soils should be designed taking into considering the expansive potential of the soils.

4.11.6.2 Significance of Impacts

The project would not result in geological hazard due to unstable soil based on the Significance Thresholds identified above. The Preliminary Geotechnical Investigation did not identify unstable geologic units on or adjacent to the project site. Medium soil expansiveness was not identified to result in a potential risk to life or property. Adherence to the recommendations presented in the Preliminary Geotechnical Investigation prepared for the project would ensure that impacts related to unstable geological units or soils would be less than significant.

4.11.6.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.12 Public Services

Public services are those functions that serve residents on a communitywide basis including fire protection and emergency medical services, police protection, public recreational facilities and parks, and libraries. The following provides a discussion of these services and facilities as they relate to the project.

4.12.1 Existing Conditions

4.12.1.1 Fire Protection/Life Safety

Fire protection services to the project area are provided by the San Diego Fire-Rescue Department (SDFD). Fire Station 25 is the closest fire station to the project site, located approximately 0.5 mile north of the project site at 1972 Chicago Street. Fire Station 25 serves the Bay Park community within Clairemont Mesa and houses a battalion chief (Battalion 3) and one engine company (Engine 25). The next closest fire station is Fire Station 20, located approximately 1.6 miles southwest of the project site at 3305 Kemper Street. Fire Station 20 houses one engine company (Engine 20), one truck (Truck 20), and a paramedic unit (Paramedic 20).

Emergency medical services are provided to the project site and throughout the City of San Diego (City) through a public/private partnership between the City's Emergency Medical Services (EMS) and the Rural Metro Corporation, which provides some personnel and some ambulances. EMS has ambulances, paramedics, and emergency medical technicians (EMTs) who respond to emergency calls. Fire Station 20 houses a paramedic unit. All fire department engines and trucks are full Advanced Life Support units and are equipped and capable of managing medical emergencies.

4.12.1.2 Police Protection

Police services are provided by the San Diego Police Department (SDPD). The SDPD currently uses a five-level priority dispatch system, which includes, in descending order: priority E (Emergency), One, Two, Three, and Four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the priority as necessary based on information received.

The project site is located within the boundaries of police Beat 116 of SDPD, Northern Division. The Northern Division Police Station is located approximately 6.9 miles north of the project site at 4274 Eastgate Mall in the La Jolla community. The Northern Division serves the neighborhoods of Bay Ho, Bay Park, Clairemont Mesa East, Clairemont Mesa West, La Jolla, Mission Bay Park, Mission Beach, North Clairemont, Pacific Beach, Torrey Pines, University City. The SDPD has mutual aid

agreements with all other law enforcement agencies in San Diego County. Additional police services for the project site are provided by the Police Community Relations Office located at 4439 Olney Street, approximately 2.2 miles northwest of the project site. This facility is a community outreach facility that provides crime prevention education and information services. Officers are not dispatched on radio call from this location.

4.12.1.3 Parks/Recreational Facilities

The City has over 38,930 acres of park and open space lands that offer a diverse range of recreation opportunities. According to the Clairemont Mesa Community Plan (CMCP), the planning area is served by six community parks, seven neighborhood parks, and four joint use parks on school sites. The total acreage of these facilities is 112 acres. Seven of the CMCP park facilities are located adjacent to elementary and junior high schools or former school sites that have been leased to private institutional uses. Four school playgrounds are open to the public after school hours, which provides additional opportunities for recreation activity. The Clairemont Mesa Community is also served by three recreation centers (Cadman Recreation Center, South Clairemont Recreation Center, and North Clairemont Recreation Center) and one aquatic complex (Clairemont Aquatic Complex).

4.12.1.4 Libraries

The project site is located in the service area of the City Library System. The City operates a central library located in downtown San Diego and 35 branch libraries in neighborhoods throughout the City. The closest libraries to the project area are the Clairemont Library located at 2920 Burgener Boulevard and the Linda Vista Library located at 2160 Urlich Street.

4.12.1.5 School Facilities

The project site is located within the San Diego Unified School District (SDUSD), which serves over 130,000 students ranging from pre-school through grade 12 in 226 educational facilities. The project site is located within the SDUSD school boundaries for Bay Park Elementary School, Marston Middle School, and Clairemont High School. Additionally, School of the Madeleine private Catholic school serving preschool through eighth grade students, private Francis Parker School serving junior kindergarten to twelfth grade students, and Mark Twain Senior High alternative high school are also located near the project site. University of San Diego is the higher education facility located closest to the project site.

4.12.2 Regulatory Framework

4.12.2.1 State

a. Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998, or Senate Bill (SB) 50, restricts the ability of local agencies to deny project approvals on the basis that public school facilities (e.g., classrooms, auditoriums) are inadequate. School impact fees are collected at the time when building permits are

issued. Payment of school fees is required by SB 50 for all new residential development projects and is considered full and complete mitigation of any school impacts. School impact fees are payments to offset capital cost impacts associated with new development, which result primarily from costs of additional school facilities, equipment, and maintenance requirements. Consequently, agencies cannot require additional mitigation for any school impacts.

b. Quimby Act

The Quimby Act (California Government Code Sections 66475–66478) was approved by the California legislature to preserve open space and parkland in the state. This legislation was in response to California's increased rate of urbanization and the need to preserve open space and provide parks and recreation facilities for California's growing communities. The Quimby Act authorizes local governments to establish ordinances requiring developers of new subdivisions to dedicate parks, pay an in-lieu fee, or perform a combination of the two.

4.12.2.2 Local

a. General Plan

Public Facilities, Services, and Safety Element

The Public Facilities, Services, and Safety Element of the General Plan identifies a number of policies intended to ensure adequate public services are available to serve future development.

Policy PF-D.1 identifies performance measures to address current and projected SDFD needs, as follows:

PF-D.1. Locate, staff, and equip fire stations to meet established response times as follows:

- a. To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5-minute company turnout time, and 5-minute drive time in the most populated areas.
- b. To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911 call receipt in fire dispatch, 90 percent of the time.
 - This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to 5 medical patients at once.
 - This equates to 1-minute dispatch time, 1.5-minute company turnout time, and 8-minute drive time spacing for multiple units in the most populated areas.

Policy PF-E.2 identifies performance standards for police response:

PF-E.2. Maintain average response time goals as development and population growth occurs. Average response time guidelines are as follows:

- Priority E Calls (imminent threat to life) within 7 minutes.
- Priority 1 Calls (serious crimes in progress) within 12 minutes.
- Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes.
- Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes.
- Priority 4 Calls (minor requests for police service) within 90 minutes.

Specific police response times for Beat 116, which serves the project area, are as follows:

- Priority E within 8.6 minutes
- Priority 1 within 21.8 minutes
- Priority 2 within 55.8 minutes
- Priority 3 within 127.2 minutes
- Priority 4 within 290.2 minutes

Recreation Element

The Recreation Element of the City's General Plan, Table RE-2 defines standards for the development of population-based parks and recreation facilities. The City defines three use categories of parks for residents and visitors: population-based parks, resource-based parks, and open space lands, as described below:

- Population-based parks (commonly known as neighborhood and community parks), facilities, and services are located in close proximity to residential development and are intended to serve the daily needs of the neighborhood and community.
- Resource-based parks are located at, or centered on, notable natural or man-made features and are intended to serve the citywide population, as well as visitors.
- Open space lands are City-owned lands located throughout the City, consisting of canyons, mesas, and other natural landforms. This open space is intended to preserve and protect native habitats, while still providing public access.

The City's General Plan park standard is to provide 2.8 acres of population-based park land per 1,000 residents. While the City's primary goal is to obtain land for park and recreation facilities, alternative methods of providing recreation facilities can be obtained through park equivalencies. These types of parks include, but are not limited to, joint use facilities, privately-owned parks or non-traditional park sites with recreation easements for public use.

b. Clairemont Mesa Community Plan

The CMCP also identifies three objectives for population-based parks including:

- Ensure the use of school playgrounds and other recreational facilities for public use after school hours.
- Continue to upgrade and modernize park and recreational facilities within the community.
- Increase recreational opportunities in new residential and commercial development.

The CMCP provides the following recommendation for private recreational facilities:

Residential development projects should be required to provide on-site private recreational facilities in order to prevent overcrowded conditions of park facilities in the future.

- Residential development projects subject to discretionary permit review such as a Planned Residential Development permit, should include recreational facilities, such as lawns, recreation rooms, tennis courts and swimming pools.
- Private or public recreational facilities, such as tennis clubs and health spas and shower facilities should be included in commercial development projects, whenever possible.

4.12.3 Significance Determination Thresholds

The following criteria are used by the City to determine significance under California Environmental Quality Act related to public services. A project would have a significant environmental impact if the project would:

- 1. Result in the need for new or expanded public facilities, including fire protection, police protection, health, social services, emergency medical, libraries, schools, and parks;
- 2. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- 3. Include recreational facilities or require the construction or expansion of recreation facilities, which might have an adverse physical effect on the environment.

4.12.4 Issue 1: Public Services

Would the project have an effect upon, or result in a need for new or altered government services in any of the following areas: fire/life safety protection; police protection; schools, parks or other recreational facilities; maintenance of public facilities, including roads and libraries, which would result in physical impacts?

4.12.4.1 Impacts

The analysis of impacts under ISSUE 1 addresses Significance Determination Threshold 1 as detailed in Section 4.12.3, above.

a. Fire Protection/Life Safety

The SDFD would provide first responder and first responder paramedic services to the project from the fire stations discussed above. The project would result in the conversion of the existing recreational vehicle park to multi-family residential uses. Consequently, the project would not expand the amount of land requiring fire protection services. The project would increase the density on the project site; however, the change in land use and intensity of residential development is not anticipated to result in a substantial increase in calls for service, requiring the need for construction of new fire safety facilities. Additionally, the project would be required to pay Development Impact

Fees (DIFs) prior to issuance of building permits that would support maintenance of fire protection services provided by the City. Therefore, the project would not necessitate the construction of additional fire protection facilities, and impacts related to local fire protection services would be less than significant.

b. Police Protection

The project site is located within the boundaries of police Beat 116 of SDPD, Northern Division. The Northern Division Police Station is located approximately 6.9 miles north of the project site at 4274 Eastgate Mall in the La Jolla community. Additional police services for the project area are provided by the Police Community Relations Office located at 4439 Olney Street, approximately 2.2 miles northwest of the project site. The residential density on the project site would increase with the project, resulting in a potential increase in calls for police response. However, the project is not anticipated to result in a substantial increase in calls for police response, resulting in a need for new police facilities. Additionally, the project would pay applicable DIFs prior to issuance of building permits, which would provide funding to maintain police protection services. Therefore, the project would not necessitate the construction of additional police protection facilities, and impacts related to local police protection services would be less than significant.

c. Parks/Recreational Facilities

According to current San Diego Association of Governments (SANDAG) estimates, the household population for the CMCP area is 80,337 (SANDAG 2016a). The General Plan's standard for population-based parks is to provide the following: 2.8 useable acres of population-based parks per 1,000 residents; a recreational center for every 25,000 residents; and an aquatics complex for every 50,000 residents. The project would increase density beyond that contemplated in the existing community plan. Specifically, the project would result in an additional 64 residential units that are not accounted for in the existing plan. These additional units would generate approximately 131 new community residents (based on SANDAG density factor of 2.05 persons per household unit), triggering a need to provide an additional 0.37 acre of park land above that included in the CMCP (2.8 acres x 1,000 residents). The project would be conditioned to pay park fees to cover pro rata shares of park land and recreational facilities. Payment of these fees would satisfy the additional usable parkland and recreational facility needs created by the project. As the project does not include or require the construction of any new public parks, there would be no associated physical impact associated with parkland construction. The project would develop private recreation facilities on the project site including outdoor gathering areas, a swimming pool, and a fitness center. While these private facilities would not be included as part of the population-based park requirements, they would provide private recreational opportunities for future residences which could offset the project's demand for public parks and facilities. With payment of park fees, the project would not contribute to an unacceptable level of service with regard to park to population ratio, and impacts related to parks and recreation facilities would be less than significant.

d. Libraries

The project site is served by the City public library system. Future residents may use the local Clairemont Library branch (1.4 miles from the project site), other library branches, and the main

downtown library. While future residents may use the public library system, the project is not anticipated to result in the need for any new libraries or modified library services and would not contribute to an unacceptable level of service. Thus, physical impacts related to new library facilities would be less than significant. In addition, branch libraries should serve a resident population of 30,000 and may be established when a service area, which is expected to grow to 30,000 residents within 20 years of library construction, has a minimum population of 18,000 to 20,000.

e. School Facilities

The project would generate new students that would increase enrollment at the SDUSD schools serving the community in which the project is located. However, Government Code Section 65995 and Education Code Section 53080 authorize school districts to impose facility mitigation fees on new development to address any increased enrollment that may result. SB 50, enacted on August 27, 1998, significantly revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation holds that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for any project-related impacts to school facilities. As such, the City is legally prohibited from imposing any additional mitigation related to school facilities, as payment of the school impact fees constitutes full and complete mitigation. The school district would be responsible for potential expansion or development of new facilities, which would undergo a separate environmental review when specific facilities are planned. Therefore, adherence to the requirements of SB 50 would ensure that project impacts to schools would be less than significant.

f. Other Public Facilities including Roads

The project would install half-width frontage improvements along Tonopah Avenue, Frankfort Street, and Morena Boulevard. These improvements are evaluated as part of the project and no significant physical impacts associated with these road improvements have been identified. No other public facility needs or deficiencies have been identified as a result of the project.

4.12.4.2 Significance of Impacts

The project would not result in a need for new or expanded public facilities, including fire protection, police protection, parks/recreation, libraries, and schools based on the significance thresholds identified above.

a. Fire Protection/Life Safety

The project would pay applicable fees prior to issuance of building permits to maintain fire protection services provided by the City. The project does not require or necessitate the construction of any fire facilities that could have an adverse physical impact on the environment. Therefore, impacts would be less than significant.

b. Police Protection

The project would pay applicable fees prior to issuance of building permits to maintain police protection services provided by the City. The project does not require or necessitate the construction of any police protection facilities that could have an adverse physical impact on the environment. Therefore, impacts would be less than significant.

c. Parks/Recreational Facilities

No new population-based park facilities would be required. The applicant would be required to pay DIFs prior to issuance of building permits to ensure funds are available to the City for the construction of future park facilities. Impacts related to parks and recreation facilities would be less than significant.

d. Libraries

The project does not require any new or modified library services to maintain acceptable levels of service. Thus, physical impacts related to new library facilities would be less than significant.

e. School Facilities

Adherence to the requirements of SB 50 through payment of a school impact fee prior to issuance of a building permit would ensure that project impacts to schools would be less than significant.

f. Other Public Facilities including Roads

Road frontage improvements proposed as part of the project are analyzed and no significant impacts have been identified associated with road improvements. No other public facility needs or deficiencies have been identified as a result of the project; thus, impacts associated with construction of other public facilities would be less than significant.

4.12.4.3 Mitigation, Monitoring, and Reporting

a. Fire Protection/Life Safety

Impacts related to fire protection services would be less than significant. No mitigation is required.

b. Police Protection

Impacts related to police protection services would be less than significant. No mitigation is required.

c. Parks/Recreational Facilities

Impacts related to population-based parks would be less than significant. No mitigation is required.

d. Libraries

Impacts related to library facilities would be less than significant. No mitigation is required.

e. School Facilities

Impacts related to schools would be less than significant. No mitigation is required.

f. Other Public Facilities including Roads

Impacts related to other public facilities, including roads, would be less than significant. No mitigation is required.

4.13 Utilities

This section evaluates potential impacts related to public utilities (storm drain, wastewater, water, water supply, and solid waste disposal) that could result from the project. Public utility information was acquired through consultation with the City of San Diego (City), relevant planning documents (General Plan, Clairemont Community Plan, the City Municipal Code), and review of public documents including the City of San Diego Urban Water Management Plan (UWMP) (City of San Diego 2016b) and the San Diego County Water Authority (SDCWA) UWMP (SDCWA 2015). In addition, the Storm Water Quality Management Plan (SWQMP) (see Appendix G), Preliminary Sewer Study (Appendix I), and the project-specific Waste Management Plan (WMP; Appendix J), are used as sources of information in this section.

4.13.1 Existing Conditions

4.13.1.1 Water Supply and Water Systems

The City's Public Utilities Department (PUD) provides potable water service to the project site. The PUD treats and delivers more than 200,000 acre-feet per year (AFY) of potable water to the approximately 1.3 million residents of the City service area. The PUD purchases up to 90 percent of its water from the SDCWA, which in turn purchases most of its water from the Metropolitan Water District (MWD). MWD imports water from two primary sources for southern California. One source is the Colorado River, which is connected to the MWD's six-county service area through a 242-mile aqueduct. Another source is water from northern California, which supplies water through a series of dams and aqueducts known as the California State Water Project. While the PUD imports the majority of its water, it also relies on three local supply sources to meet or offset potable water demands. These include local surface water, conservation, and recycled water. MWD is active in increasing local supplies through sponsoring recycling, conservation, groundwater recovery, and desalination efforts. Imported supplies also help to replenish local groundwater basins.

The PUD maintains surface storage reservoirs, water treatment plants, and pump stations as part of their water system. The water system also includes transmission and distribution pipelines to deliver potable water to developed areas. The existing water distribution system in the project area includes an 8-inch public water main located in Frankfort Street, adjacent to the project site. This 8-inch public water main runs north-south along Frankfort Street, connecting with a 16-inch public water main located in Morena Boulevard.

4.13.1.2 Wastewater Systems

Existing sewer mains are located within existing utility easements along Frankfort Street, Morena Boulevard, and West Morena Boulevard. Frankfort Street contains an existing 24-inch and 6-inch

sewer main, and the Frankfort Street 6-inch sewer line would be converted to a private line with an Encroachment Maintenance and Removal Agreement. Morena Boulevard and West Morena Boulevard contain an 8-inch sewer main that connects to the 6-inch sewer main in Frankfort Street.

Additionally, during project processing, City staff identified that the 8-inch sewer line along the Morena Boulevard and West Morena Boulevard frontages was located under the sidewalk/curb area. As the preferred location for a sewer line is in the street with a five foot buffer between the curb and the sewer; the project applicant agreed to redesign the project frontage to move the sidewalk toward the project site to allow for the sewer line to be relocated into the street. This essentially provides a wider road right of way, increasing the travel way by 4 to 5 feet along the project frontage to accommodate the sewer line. This shifting of the sidewalk location toward the development area required creation of a tiered retaining wall between the sidewalk and the development area.

The PUD provides wastewater collection, treatment, and disposal services to the San Diego region through its Metropolitan Sewerage System. The system serves a population of 2.2 million from 16 cities and districts within the greater San Diego area, which generates approximately 180 million gallons per day (gpd) of wastewater. Planned improvements to existing facilities would increase wastewater treatment capacity to serve an estimated population of 2.9 million through the year 2050, when nearly 340 million gpd of wastewater are anticipated to be generated. Waste generated at the project site is transported to the Point Loma Wastewater Treatment Facility. The Point Loma Wastewater Treatment Facility treats approximately 175 million gallons per day (mgd) generated in a 450 square mile area, and has a capacity of 240 mgd.

4.13.1.3 Solid Waste

Land uses on the project site currently generate solid waste associated with the existing recreational vehicle park and residences. Solid waste generated in the City is mainly collected by City-franchised haulers. In addition to the service provided by these haulers, the City provides waste collection pursuant to the People's Ordinance to single-family residences on public streets. There are three major disposal facilities within the San Diego region and several material recovery facilities that sort segregated and comingled recyclable materials for shipping to processing centers. The three disposal facilities are the City-operated Miramar Landfill, and the privately-operated Sycamore and Otay landfills. Allied Waste Industries owns and operates landfills at Otay (off Otay Valley Road in Chula Vista) and at Sycamore Canyon (north of State Route 52 near Mast Boulevard). The third is Miramar Landfill, operated by the City on land owned by the U.S Navy. All landfills within the San Diego region are approaching capacity and are due to close within the next 3 to 20 years.

4.13.2 Regulatory Framework

4.13.2.1 Water

a. Urban Water Management Plans

The availability of sufficient imported and regional water supplies to serve existing and planned uses within the PUD service area is demonstrated through the MWD and SDCWA UWMP. The SDCWA adopted the 2015 UWMP on June 23, 2016. Main components of the Water Authority's plan include: baseline demand forecasts under normal weather, dry weather and climate change scenarios; conservation savings estimates and net water demand projections; a water supply assessment; supply reliability analysis; and scenario planning. The Water Authority's 2015 UWMP estimates that future water demands will be about 13 percent lower in 2020 and about 12 percent lower in 2035 compared to projections in the 2010 plan. The City Public adopted its 2015 UWMP in June 2016. The plan details the City's water system, water demands, sources of water supplies, water conservation efforts, climate change impacts, energy intensity, water shortage contingency planning, and projected water supply reliability during normal, dry, and multi-year drought conditions.

4.13.2.2 **Solid Waste**

a. Assembly Bill 341

Effective July 1, 2012, Assembly Bill (AB) 341 requires all California businesses or public entity that generates more than 4 cubic yards of commercial solid waste (garbage) per week or is a multi-family residential dwelling of 5 units or more, must arrange for recycling services, on and after July 1, 2012. AB 341 sets a statewide goal of 75 percent disposal reduction by the year 2020 and implements the solid waste diversion mandate identified in the Global Warming Solutions Act (AB 32).

b. Zero Waste Plan

The City's Zero Waste Plan was approved and adopted by City Council on July 13, 2015. The Zero Waste Plan lays out strategies to divert 75 percent of all trash by 2020, 90 percent diversion by 2035, and an ultimate goal of zero waste by 2040.

c. City of San Diego Recycling Ordinance

The City's Recycling Ordinance requires on-site recyclable collection for all single-family residences; City-serviced multi-family residences; and privately-serviced businesses, commercial/institutional facilities, apartments, condominiums, and special events requiring a City permit. The ordinance requires recycling of plastic and glass bottles and jars, paper, newspaper, metal containers and cardboard. City-serviced residences and privately-serviced commercial and institutional properties must also recycle rigid plastics including clean food waste containers, jugs, tubs, trays, pots, buckets, and toys. To monitor compliance with the ordinance, annual reports must be submitted to the City's Environmental Services Division from those providing recyclable material collection services.

d. Refuse and Recyclable Materials Storage Regulations

The City's Refuse and Recyclable Materials Storage Regulations indicate the minimum exterior refuse and recyclable material storage areas required at residential and commercial properties. These are intended to provide permanent, adequate, and convenient space for the storage and collection of refuse and recyclable materials; encourage recycling of solid waste to reduce the amount of waste material entering landfills; and meet the recycling goals established by the City Council and mandated by the State of California. The regulations provide minimum requirements for the size and location of material storage areas.

e. Construction and Demolition (C&D) Debris Deposit Ordinance

In July 2008, the Construction and Demolition (C&D) Debris Deposit Ordinance was adopted by the City. The ordinance requires that the majority of construction, demolition, and remodeling projects requiring building, combination, or demolition permits pay a refundable C&D Debris Recycling Deposit and divert at least 50 percent of their waste by recycling, reusing, or donating reusable materials. For projects with permits issued on or after July 1, 2016, the diversion requirement increased to 65 percent by weight of the total C&D debris generated by the project. The diversion requirement for projects with permits issued through June 30, 2016 remains at 50 percent. The ordinance is designed to keep C&D materials out of local landfills.

4.13.3 Significance Determination Thresholds

The following criteria are used by the City to determine significance under California Environmental Quality Act related to public utilities. A project would have a significant impact if the project would:

- Result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts (water, sewer, solid waste disposal, natural gas, and communication systems);
- 2. Result in the use of excessive amounts of fuel or energy (e.g. natural gas);
- 3. Result in the use of excessive amounts of power;
- 4. Result in the use of excessive amounts of water; or
- 5. Propose landscaping which is predominantly non-drought resistant vegetation.

Use of fuel, energy, and power associated with Thresholds 2 and 3 are addressed in Section 5.2 of this Environmental Impact Report (EIR) regarding irreversible environmental changes which would result if the project is implemented.

4.13.4 Issue 1: Utilities

Would the project result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts (water, sewer, solid waste disposal, natural gas, and communication systems)?

4.13.4.1 Impacts

The analysis of impacts under Issue 1 addresses Significance Determination Thresholds 1, 4, and 5 as detailed in Section 4.13.3, above.

a. Water Supply

The discussion of water supply addresses Significance Determination Thresholds 4 and 5 as detailed in Section 4.13.3, above. The project would not require excessive amounts of water. New construction by its nature requires installation of higher water efficiency fixtures and appliances compared to existing older development. Additionally, the project is a multi-family development, which would demand less water per acre than a single-family development on the same project size. The project would comply with landscaping standards that require a maximum water allowance budget and use of low and moderate water use plants. The project would comply with a Climate Action Plan Checklist prepared for the project site that identifies measures that would ensure water efficiency (Appendix K).

Additionally, water supply would be adequate to serve the project based on existing water supply planning documents.

The 2015 SDCWA UWMP provides for a comprehensive planning analysis at a regional level and includes a water supply reliability assessment comparing the total projected water supply and demand over the next 25 years in five-year increments. The 2015 SDCWA UWMP anticipated that water demand needs for the City would be 168,970 AFY in 2020, surpassing the estimated City demands of 161,334 AFY (as estimated in the 2015 City UWMP) by 7,636 AFY. The SDCWA anticipates that under normal water year conditions, if supplies are maintained and developed as planned and additional water conservation measures continue to be incorporated, no water supply shortages would be anticipated within the SDCWA's service area through the year 2040. SDCWA water supply planning documents water demand projections for the City in the year 2020 are in excess of the demand projections from the City UWMP. Thus, as the SDCWA anticipates water supply will meet demand over the next 40 years under normal conditions, there would be sufficient water supply to cover the water demands of the proposed project. Therefore, the project would not result in a need for new water supply beyond that contemplated by the City. Impacts related to excessive water use and use of non-drought resistant landscaping would be less than significant.

In addition to the availability of water to meet the potable water demands of the project as demonstrated by the SDCWA UWMP, the City is actively pursuing additional ways to increase the reliability of local water supply options. One such program is Pure Water San Diego which is a phased, multi-year program anticipated to provide one-third of San Diego's water supply locally by 2035 by implementing water purification technology to clean recycled water to produce safe, high-

quality drinking water. Additionally, the City is implementing its 2011 Recycled Water Master Plan that will continue to capture wastewater for reuse as irrigation water. The City has also established permanent water conservation requirements regardless of drought status and continues to implement water conservation programs and incentives for residents.

b. Water System

The existing water distribution system in the project area includes an 8-inch public water main located in Frankfort Street, adjacent to the project site, which connects to a 16-inch water main located in Morena Boulevard. The project proposes to place 8-inch domestic water mains in private drives throughout the project site. The 8-inch domestic mains would connect to the existing public water main at two connection points near the project driveways on Frankfort Street and Morena Boulevard. Proposed water mains would connect to the existing 8-inch public water main in Frankfort Street and the existing 16-inch public water main in Morena Boulevard. The proposed domestic water main system would be developed to provide looped water mains, where possible, to reduce the number of dead-end mains.

The private water systems would be designed and constructed in accordance with the criteria established within the current California Building Code, and any proposed water facilities within the public right-of-way or public easement would be designed and constructed in accordance with the criteria established within the City's current water and sewer facility design guidelines, regulations, standards and practices. Construction of proposed water lines and connections to public mains is evaluated as part of the project footprint and would be located within the project site or within the existing developed road right-of-way. Physical impacts associated with installation of water systems needed to serve the project would be less than significant.

c. Wastewater System

A preliminary sewer study was prepared for the project and is included as Appendix I. Wastewater generated form the project will be collected through a series of private 6-inch collector lateral pipes connecting to the existing 6-inch public sewer main in Frankfort Street. Based on the sewer calculations conducted for the project, the discharge would not exceed the hydraulic capacity of the existing 6-inch downstream pipe in Frankfort Street.

An analysis of the local wastewater system was conducted in order to determine whether the proposed private wastewater system(s) would meet the City and California Uniform Plumbing Code standards and determine if the existing sewer system has capacity to support the project. Additionally, the proposed system and affected downstream pipes would meet the design criteria established in the City's Sewer Design Guide.

Activities necessary to construct the proposed on-site facilities could temporarily impact traffic circulation, ambient noise levels, and may result in air emissions. These construction-related impacts are addressed under each of these issue areas within this EIR. No additional significant impacts associated with the construction of wastewater facilities would result from project implementation.

d. Solid Waste

The City requires all new development projects within a 40,000-square-foot threshold to prepare a WMP that addresses waste generated during short-term project construction and long-term post-construction operation. The WMP is required to identify how the project would reduce waste and achieve target reduction goals and must include: projected waste generation calculations and identification of the types of waste materials generated; description of how materials would be reused on-site; identification of source separation techniques for recycling; and identification of recycling and reuse facilities where waste would be taken if not reused on-site.

To facilitate operational waste reduction, new multi-dwelling residential developments must also comply with the City's Municipal Code requiring provision of adequate space for storage and collection of refuse and recyclable materials. On-site recyclables collection is now required for all single- and multi-dwelling residential and commercial uses in accordance with the City's Recycling Ordinance, adopted November 2007. The focus of the ordinance is on education, with responsibility shared between the City's Environmental Services Department (ESD), haulers, and building owners/managers. ESD provides on-site technical assistance, educational materials, templates, and service provider lists. Property owners/managers provide on-site recycling services and educational materials annually and to new tenants. Occupants/tenants participate in the program by separating recyclables from trash.

Waste would be generated from the demolition, grading, construction, and operational phases of the project. Demolition activities would be required for approximately 75 percent of the 5.90-net-acre site equivalent to approximately 3,056 tons of asphalt, concrete, and multiple buildings/residences. Following demolition activities, grading would result in a net soil import of approximately 1,000 cubic yards. All vegetation removed during site preparation, including trees and shrubs, would be taken to the Miramar Greenery for 100 percent composting. Small- to medium-sized trees located within the existing development are estimated to account for approximately 125 tons. Based on the project construction requirements, it is anticipated that approximately 413 tons of waste would be generated.

As described in the WMP, the project's demolition, grading, and construction phases would achieve a total waste diversion rate of 96 percent. The project would be required to pay a refundable Construction and Demolition Debris Diversion Deposit along with submittal of the WMP at the time of building permit or demolition permit issuance. The applicant would receive the refunded deposit when evidence of the actual diversion rate for construction/demolition shows that the WMP goal was achieved. With implementation of the WMP, impacts to solid waste facilities during the construction, grading, and demolition phases of the project would be less than significant.

Once project construction is complete, the project would generate solid waste associated with project operation. The estimated annual waste to be generated during project operation would be approximately 139 tons per year. Per the City Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7) solid waste would be recycled during operation to the maximum extent possible. Each unit is designed to accommodate space for both refuse and recycling bins and recycling bins would be provided throughout the project site including within all common areas and within trash/recycling enclosures. A total of 576 square feet of exterior refuse and recyclable material

storage area would be provided on-site. Installation of drought tolerant plants, as indicated on the project landscape plans would result in a reduction in the amount of yard waste once the project is constructed and occupied.

In order to further reduce operational waste impacts to below a level of significance, the applicant or the applicant's successor in interest shall ensure occupants are educated about the on-site recycling services consistent with the requirement of the San Diego Municipal Code, Chapter 6, Article 6, Division 7, Section 66.0706f, which requires the following:

- 1. Information, including the types of recyclable materials accepted, the location of recycling containers, and the occupants responsibility to recycle, shall be distributed to all occupants annually.
- 2. All new occupants shall be given information and instructions upon occupancy.
- 3. All occupants shall be given information and instructions upon any change in recycling service to the facility.

Based on the volume of anticipated waste generation, the anticipated diversion rate of 40 percent for large multi-family complexes, the project would generate 83 tons of waste per year after diversion. However, with implementation of the City Recycling Ordinance and the requirements of the project specific WMP, solid waste impacts would be reduced to less than significant.

e. Natural Gas

Natural gas is imported into the San Diego region by pipeline after being produced at any of several major supply basins located from Texas to Alberta, Canada. The San Diego region has access to all of these basins by interstate pipeline. However, the final delivery into the local system is dependent on one Southern California Gas Company (SoCalGas) high pressure pipeline which enters San Diego County from Orange County along Interstate 5.

Natural gas consumption varies somewhat each year. In general, power plants account for the highest percentage of natural gas consumption in the San Diego region. Residential consumption of natural gas for heating and cooking is the second highest percentage, followed by cogeneration, commercial and industrial consumption, and natural gas fueled vehicles. In 2015, California consumed 2,309,759 million cubic feet of natural gas (U.S. Energy Information Association 2017). SDG&E is the natural gas service provider for the San Diego region.

f. Communication Systems

Private utility companies currently provide communications systems within the Clairemont Mesa Community Plan (CMCP) area. Future siting of communications infrastructure would be in accordance with the Land Development Code, including Section 141.0420 regulating wireless communications facilities, as well as the City's Wireless Communications Facilities Guidelines, which seek to minimize visual impacts. Adhering to General Plan policies supporting the City's undergrounding program would also ensure that visual impacts of new facilities are minimized. Any construction of communications systems associated with future development would occur in accordance with the City's permitting processes and construction standards to avoid or minimize

impacts on environmentally sensitive habitat areas and landforms through siting, grading or excavation, and erosion. Therefore, impacts associated with communications facilities from buildout of the proposed project would be less than significant

4.13.4.2 Significance of Impacts

The project would not result in the need for new systems, or require substantial alterations to existing utilities (water, sewer, solid waste disposal, natural gas, and communication systems) based on the significance thresholds identified above.

a. Water Supply

Based on the anticipated water demand assessments included in the 2015 City of San Diego and SDCWA UWMPs, current and future water supplies would be adequate to serve the projected needs of the project, as well as regional water needs. As a result, no new or expanded sources of water supply would need to be developed that could result in physical impacts to the environment. As the existing and planned water supply is adequate to serve the water demands of the project, impacts would be less than significant.

b. Water System

Water distribution pipelines would be installed within project streets on-site and would connect to existing mains within the adjacent streets. No water system extensions would be required to serve the project. Proposed water infrastructure would meet City Water Department Facility Design Guidelines, and impacts would be less than significant.

c. Wastewater System

Wastewater infrastructure would be installed within project site consisting of a series of private 6-inch collector laterals, connecting to the 6-inch public sewer main in Frankfort Street. No new facilities would be required. The sewer study evaluated the hydraulics of the proposed on-site private sewer mains as well as the existing 6-inch public sewer main in Frankfort Street. The results of the analysis demonstrate that the proposed on-site private sewer mains would meet design and flow requirements in accordance with the City Sewer Design Guide. In addition, the project would not cause any significant impacts to the existing off-site public 6-inch sewer main in Frankfort Street. Impacts would be less than significant.

d. Solid Waste

As described in the WMP, the project's demolition, grading, and construction phases would achieve a total waste diversion rate of 96 percent. The applicant or applicant's successor in interest would be required to implement the project-specific WMP during project operation to comply with the City's Recycling Ordinance and ensure solid waste impacts are reduced to less than significant. Measures required in the Recycling Ordinance and WMP include resident education, providing waste and recycling bins throughout common areas of the project site, providing space in residential units for waste and recycling, and providing exterior refuse and recyclable storage areas consistent with the

Recycling Ordinance. With implementation of the WMP and compliance with existing regulations, impacts related to solid waste would be less than significant.

e. Natural Gas

There are existing natural gas facilities present in the surrounding roadways and available to serve the project. Impacts would be less than significant.

f. Communication Systems

A number of private utility providers are available to serve the CMCP area. Facilities are existing in surrounding roadways and are available to serve the project. Impacts would be less than significant.

4.13.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.13.5 Issue 2: Water Conservation and Landscaping

Would the project result in the use of excessive amounts of water?

Would the project propose landscaping which is predominantly non-drought resistant vegetation?

4.13.5.1 Impacts

The analysis of impacts under issue 2 addresses Significance Determination Thresholds 4 and 5 as detailed in Section 4.13.3, above. The project would demolish the existing recreational vehicle park and older existing residences and develop the site with 150 multi-family residential units. All new residential developments are subject to current, stringent standards for installation of water-efficient appliances, fixtures, and landscaping. The project would be required to comply with the 2016 California Green Building Standards Code Section 4.303, which calls for the installation of water conserving plumbing fixtures and fittings, and Section 4.304, which calls for residential developments with an aggregate landscape area equal to or greater than 500 square feet to comply with a local water efficient landscape ordinance.

Additionally, the project has completed a Climate Action Plan (CAP) Consistency Checklist (see Appendix K) that includes specific measures for water conservation including installation of low-flow, water-efficient plumbing fixtures, including low-flow kitchen faucets, shower heads and low-flush toilets and installation of smart irrigation controllers.

The project includes approximately 68,205 square feet of landscaping throughout the project site requiring water use for irrigation purposes (see Figures 3-4a through 3-4c). One hundred percent of the landscaped area will be either low or moderate water use plantings. Low water use areas include all of the slopes surrounding the project site for a total of 28,592 square feet. Moderate water use landscaping is proposed adjacent to the proposed structures and includes plantings in proposed storm water bioretention areas which will benefit from runoff water. Total anticipated landscape

water use is anticipated at 1,033,891 gallons per year. This anticipated annual landscape water use would be below the maximum applied water allowance according to Section II, Irrigation Systems, of the Landscape Standards in the City's Land Development Code (LDC). The maximum applied water allowance for the project site would be 1,093,122 gallons per year. Thus, the project's landscape water use would be below the maximum applied water allowance.

The project would adhere to existing City Landscape Regulations (LDC Section 142.0403(b)(2) and the City Land Development Manual Landscape Standards revised in 2016 to ensure appropriate plant materials are selected, installed and maintained and that irrigation efficiency is maximized. As required by the City's Landscape Standards, all irrigation systems (valve systems, piping and pressure regulators) shall:

- Be designed to deliver water to hydrozones based on the moisture requirements of the plant grouping;
- Deliver water efficiently and uniformly and be appropriate to the needs of the plant materials;
- Install moisture sensors per manufacturer's recommendations; and
- Ensure all automatic irrigation controllers and moisture sensing systems are be adjusted seasonally and as weather and plant conditions warrant.

The landscape standards, found in the City's Land Development Manual, provide direction for the placement of preferred and acceptable plants. Preferred plants are water-conserving plants that are easily maintained and have no known history of problems, and acceptable plants are those satisfying minimum performance standards. Prohibited plants are those that do not satisfy minimum performance standards. The project would not include any prohibited plants, as identified in LDC Section 1.3-1.03 (Table 1 Prohibited Species). In addition to identifying specific plants, the Landscape Standards provide guidance for drainage installation and maintenance. This assures landscape systems are designed, constructed, and managed to maximize overall irrigation efficiency within the limits established by the maximum applied water allowance.

As the project would be required to comply with current regulations and standards related to water use efficiency in both residential developments and landscaping, the project would not use excessive amounts of water and would not install predominantly non-drought resistant landscaping. Impacts would be less than significant.

4.13.5.2 Significance of Impacts

The project would not propose predominantly non-drought resistant vegetation landscaping which would result in the need to use excessive amounts of water based on the significance thresholds identified above. The project's water use would not be considered excessive considering required compliance with current building code standards, the City's CAP Consistency Checklist requirements, and the City's landscape regulations. Impacts would be less than significant.

4.13.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.14 Air Quality

This section evaluates potential impacts associated with air quality issues including whether the project would conflict with or obstruct an applicable air quality plan, violate any air quality standards, expose sensitive receptors to substantial pollutant concentrations, or exceed 100 pounds per day of particulate matter (dust), or create objectionable odors. The impact analysis is based on the Air Quality Analysis prepared by RECON included as Appendix L of this EIR.

4.14.1 Existing Conditions

The project site is located within the San Diego Air Basin (SDAB), which is regulated locally by the San Diego Air Pollution Control District (SDAPCD). Air quality at a particular location is a function of the kinds, amounts, and dispersal rates of pollutants being emitted into the air locally and throughout the basin. The major factors affecting pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants (which is affected by inversions), and the local topography.

Air quality is commonly expressed as the number of days per year in which air pollution levels exceed state standards set by the California Air Resources Board (CARB) or federal standards set by the Environmental Protection Agency (EPA).

The SDAPCD maintains 10 air quality monitoring stations located throughout the greater San Diego metropolitan region. Air pollutant concentrations and meteorological information are continuously recorded at these stations. Measurements are then used by scientists to help forecast daily air pollution levels. The San Diego–Beardsley Street monitoring station, located approximately 6 miles south of the project site, is the nearest station to the project site. The San Diego—Beardsley Street monitoring station measures ozone, nitrogen dioxide (NO_2), carbon monoxide (NO_2), and 2.5-micron particulate matters ($PM_{2.5}$). Table 4.14-1 provides a summary of measurements collected at the San Diego – Beardsley Street monitoring station for the years 2011 through 2015.

4.14.1.1 Ozone

Nitrogen oxides and hydrocarbons (reactive organic gases [ROG]) are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone, which is the primary air pollution problem in the SDAB. Because sunlight plays such an important role in its formation, ozone pollution—or smog—is mainly a concern during the daytime in summer months. The SDAB is currently designated a federal and state non-attainment area for ozone. During the past 25 years, San Diego had experienced a decline in the number of days with unhealthy levels of ozone despite the region's growth in population and vehicle miles traveled (SDAPCD 2013).

Table 4.14-1 Summary of Air Quality Measurements Recorded at the San Diego – Beardsley Street Monitoring Station						
Pollutant/Standard	2011	2012	2013	2014	2015	
Ozone						
Days State 1-hour Standard Exceeded (0.09 ppm)	0	0	0	0	0	
Days State 8-hour Standard Exceeded (0.07 ppm)	0	0	0	2	0	
Days Federal 8-hour Standard Exceeded (0.075 ppm)	0	0	0	0	0	
Max. 1-hr (ppm)	0.082	0.071	0.063	0.093	0.089	
Max 8-hr (ppm)	0.061	0.065	0.053	0.073	0.067	
Nitrogen Dioxide						
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0	0	0	
Days Federal 1-hour Standard Exceeded (0.100 ppm)	0	0	0	0	0	
Max 1-hr (ppm)	0.067	0.065	0.072	0.075	0.062	
Annual Average (ppm)	0.014	0.013	0.014	0.013	0.014	
Carbon Monoxide						
Days Federal 8-hour Standard Exceeded (35 ppm)	0	0				
Days State 8-hour Standard Exceeded (20 ppm)	0	0				
Max. 8-hr (ppm)	2.44	1.81				
PM ₁₀ *						
Measured Days State 24-hour Standard Exceeded (50 μg/m³)	0	0	1	0	1	
Calculated Days State 24-hour Standard Exceeded (50 μg/m ³)	0.0	0.0	6.0	0.0	5.7	
Measured Days Federal 24-hour Standard Exceeded (150 μg/m³)	0	0	0	0	0	
Calculated Days Federal 24-hour Standard Exceeded (150 μg/m³)	0.0	0.0	0.0	0.0	0.0	
Max. Daily (μg/m³)	49.0	47.0	92.0	41.0	54.0	
State Annual Average (μg/m³)	24.0	22.2	25.4	23.8	23.2	
Federal Annual Average (μg/m³)		21.8	24.9	23.3	23.0	
PM _{2.5} *						
Measured Days Federal 24-hour Standard Exceeded (35 μg/m³)	0	1	1	1	0	
Calculated Days Federal 24-hour Standard Exceeded (35 μg/m³)		1.0	1.1	1.0	0.0	
Max. Daily (μg/m³)		39.8	37.4	37.2	44.9	
State Annual Average (μg/m³)	10.9		10.4	10.2	10.2	
Federal Annual Average (μg/m³)	10.8	11.0	10.3	10.1	9.3	

SOURCE: CARB 2016b.

ppm = parts per million

μg/m³ = micrograms per cubic meter

About half of smog-forming emissions come from automobiles. Population growth in San Diego has resulted in a large increase in the number of automobiles expelling ozone-forming pollutants while operating on area roadways. In addition, the occasional transport of smog-filled air from the South Coast Air Basin only adds to the SDAB's ozone problem. Stricter automobile emission controls, including more efficient automobile engines, have played a large role in why ozone levels have steadily decreased.

^{-- =} Not available.

^{*}Calculated days value. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.

In order to address adverse health effects due to prolonged exposure, the U.S. EPA phased out the national 1-hour ozone standard and replaced it with the more protective 8-hour ozone standard. The SDAB is currently a non-attainment area for the previous (1997) national 8-hour standard, and is recommended as a non-attainment area for the revised (2008) national 8-hour standard of 0.075 ppm.

Not all of the ozone within the SDAB is derived from local sources. Under certain meteorological conditions, such as during Santa Ana wind events, ozone, and other pollutants are transported from the Los Angeles Basin and combine with ozone formed from local emission sources to produce elevated ozone levels in the SDAB.

Local agencies can control neither the source nor the transportation of pollutants from outside the air basin. The SDAPCD's policy, therefore, has been to control local sources effectively enough to reduce locally produced contamination to clean air standards. Through the use of air pollution control measures outlined in the Regional Air Quality Standards (RAQS), the SDAPCD has effectively reduced ozone levels in the SDAB.

Actions that have been taken in the SDAB to reduce ozone concentrations include:

- Transportation Control Measures (TCMs) if vehicle travel and emissions exceed attainment demonstration levels. TCMs are strategies that will reduce transportation-related emissions by reducing vehicle use or improving traffic flow.
- Enhanced motor vehicle inspection and maintenance program. The smog check program is overseen by the Bureau of Automotive Repair. The program requires most vehicles to pass a smog test once every two years before registering in the state of California. The smog check program monitors the amount of pollutants automobiles produce. One focus of the program is identifying "gross polluters," or vehicles that exceed two times the allowable emissions for a particular model. Regular maintenance and tune-ups, changing the oil, and checking tire inflation can improve gas mileage and lower air pollutant emissions. It can also reduce traffic congestion due to preventable breakdowns, further lowering emissions.
- Air Quality Improvement Program (AQIP). This program, established by Assembly Bill (AB)
 118, is a voluntary incentive program administered by the CARB to fund clean vehicle and
 equipment projects, research on biofuels production and the air quality impacts of
 alternative fuels, and workforce training.

4.14.1.2 Carbon Monoxide

The SDAB is classified as a state attainment area and as a federal maintenance area for CO. Until 2003, no violations of the state standard for CO had been recorded in the SDAB since 1991, and no violations of the national standard had been recorded in the SDAB since 1989. The violations that took place in 2003 were likely the result of massive wildfires that occurred throughout the county. No violations of the state or federal CO standards have occurred since 2003.

Small-scale, localized concentrations of CO above the state and national standards have the potential to occur at intersections with stagnation points such as those that occur on major

highways and heavily traveled and congested roadways. Localized high concentrations of CO are referred to as "CO hot spots" and are a concern at congested intersections, where automobile engines burn fuel less efficiently and their exhaust contains more CO.

4.14.1.3 Particulate Matter

Particulate matter is a complex mixture of microscopic solid or liquid particles including chemicals, soot, and dust. Anthropogenic sources of direct particulate emissions include crushing or grinding operations, dust stirred up by vehicle traffic, and combustion sources such as motor vehicles, power plants, wood burning, forest fires, agricultural burning, and industrial processes. Additionally, indirect emissions may be formed when aerosols react with compounds found in the atmosphere.

Health studies have shown a significant association between exposure to particulate matter and premature death in people with heart or lung diseases. Other important effects include aggravation of respiratory and cardiovascular disease, lung disease, decreased lung function, asthma attacks, and certain cardiovascular problems such as heart attacks and irregular heartbeat (U.S. EPA 2016).

As its properties vary based on the size of suspended particles, particulate matter is generally categorized as particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) or particulate matter with an aerodynamic diameter of 2.5 microns or less ($PM_{2.5}$).

PM₁₀

 PM_{10} , occasionally referred to as "inhalable coarse particles" has an aerodynamic diameter of about one-seventh of the diameter of a human hair. High concentrations of PM_{10} are often found near roadways, construction, mining, or agricultural operations.

$PM_{2.5}$

 $PM_{2.5}$, occasionally referred to as "inhalable fine particles" has an aerodynamic diameter of about one-thirtieth of the diameter of a human hair. $PM_{2.5}$ is the main cause of haze in many parts of the United States. Federal standards applicable to $PM_{2.5}$ were first adopted in 1997.

4.14.1.4 Other Criteria Pollutants

The national and state standards for NO_2 , oxides of sulfur (SO_X), and the previous standard for lead are being met in the SDAB, and the latest pollutant trends suggest that these standards will not be exceeded in the foreseeable future. As discussed above, new standards for these pollutants have been adopted, and new designations for the SDAB will be determined in the future. The SDAB is also in attainment of the state standards for vinyl chloride, hydrogen sulfides, sulfates, and visibility-reducing particulates.

4.14.2 Regulatory Framework

4.14.2.1 Federal Regulations

The federal Clean Air Act (CAA) was enacted in 1970 and amended in 1977 and 1990 [42 United States Code (U.S.C.) 7401] for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, in order to achieve the purposes of Section 109 of the CAA [42 U.S.C. 7409], the U.S. EPA developed primary and secondary National Ambient Air Quality Standards (NAAQS).

Six criteria pollutants of primary concern have been designated: ozone, CO, sulfur dioxide (SO_2), nitrogen dioxide (NO_2), lead (PO_2), and PM_{10} and $PM_{2.5}$. The primary NAAQS were established, with a margin of safety, considering long-term exposure for the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties). The NAAQS are presented in Table 4.14-2 (CARB 2016c).

An air basin is designated as either attainment or non-attainment for a particular pollutant. Once a non-attainment area has achieved the ambient air quality standards (AAQS) for a particular pollutant, it is redesignated as an attainment area for that pollutant. To be redesignated, the area must meet air quality standards for three consecutive years. After redesignation to attainment, the area is known as a maintenance area and must develop a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the federal CAA. The SDAB is a non-attainment area for the federal ozone standard.

4.14.2.2 State Regulations

a. Criteria Pollutants

The CARB has developed the California AAQS (CAAQS) and generally has set more stringent limits on the criteria pollutants than the NAAQS (see Table 4.14-2). In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Similar to the federal CAA, the state classifies as either "attainment" or "non-attainment" areas for each pollutant based on the comparison of measured data with the CAAQS. The SDAB is a non-attainment area for the state ozone standards, the state PM_{10} standard, and the state $PM_{2.5}$ standard.

b. Toxic Air Contaminants

The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. Diesel-exhaust particulate matter emissions have been established as TACs. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (AB 1807: Health and Safety Code Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

			Table 4.14-2 ient Air Quality St	andards			
	Averaging		Standards ¹	2.5	National Standards ²		
Pollutant	Time	Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷	
Ozone ⁸	1 Hour 8 Hour	0.09 ppm (180 µg/m³) 0.07 ppm (137 µg/m³)	Ultraviolet Photometry	- 0.070 ppm (137 μg/m³)	Same as Primary Standard	Ultraviolet Photometry	
5	24 Hour	50 μg/m ³		150 µg/m ³	_		
Respirable Particulate Matter (PM ₁₀) ⁹	Annual Arithmetic Mean	20 μg/m ³	Gravimetric or Beta Attenuation	-	Same as Primary Standard	Inertial Separation and Gravimetric Analysis	
Fine Particulate	24 Hour	No Separate State	Gravimetric or			Inertial Separation and Gravimetric Analysis	
Matter (PM _{2.5}) ⁹	Annual Arithmetic Mean				15 μg/m³		
	1 Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)	-		
Carbon	8 Hour	9.0 ppm (10 mg/m ³)	Non-dispersive Infrared	9 ppm (10 mg/m ³)	-	Non-dispersive Infrared	
Monoxide (CO)	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)	Photometry	-	-	Photometry	
Nitrace	1 Hour	0.18 ppm (339 μg/m³)	Gas Phase	100 ppb (188 μg/m³)	-	Can Disease Cl	
Nitrogen Dioxide (NO ₂) ¹⁰	Annual Arithmetic Mean	0.030 ppm (57 μg/m³)	Chemi- luminescence	0.053 ppm (100 µg/m³)	Same as Primary Standard	Gas Phase Chemi- luminescence	
	1 Hour	0.25 ppm (655 μg/m³)		75 ppb (196 μg/m³)	-		
	3 Hour	-		-	0.5 ppm (1,300 μg/m³)	Ultraviolet Fluorescence;	
Sulfur Dioxide (SO ₂) ¹¹	24 Hour	0.04 ppm (105 μg/m³)	Ultraviolet Fluorescence	0.14 ppm (for certain areas) ¹¹	-	Spectro- photometry (Pararosaniline	
	Annual Arithmetic Mean	-		0.030 ppm (for certain areas) ¹¹	-	Method)	
	30 Day Average	1.5 μg/m ³		-	-		
Lead ^{12,13}	Calendar Quarter	-	Atomic	1.5 µg/m ³ (for certain areas) ¹²	Same as	High Volume Sampler and	
	Rolling 3-Month Average	-		0.15 μg/m ³	Primary Standard	Atomic Absorption	
Visibility Reducing Particles ¹⁴	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape				
Sulfates	24 Hour	25 μg/m³	lon Chroma- tography	No National Standards			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 μg/m³)	Ultraviolet Fluorescence				
Vinyl Chloride ¹²	24 Hour	0.01 ppm (26 µg/m³)	Gas Chroma- tography				
See footnotes on i	next page.	· · · · · ·		•			

ppm = parts per million; ppb = parts per billion; μ g/m³ = micrograms per cubic meter; – = not applicable.

- California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, particulate matter (PM_{10} , $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
- Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- ⁴ Any equivalent measurement method which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.
- National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- ⁶ National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
- ⁸ On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 μ g/m³ to 12.0 μ g/m³. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 μ g/m³, as was the annual secondary standards of 15 μ g/m³. The existing 24-hour PM_{10} standards (primary and secondary) of 150 μ g/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of ppb. California standards are in units of ppm. To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- 11 On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
 - Note that the 1-hour national standard is in units of ppb. California standards are in units of ppm. To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- The Air Resources Board has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- ¹³ The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 μg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- ¹⁴ In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

SOURCE: CARB 2016c.

c. State Implementation Plan

The State Implementation Plan (SIP) is a collection of documents that set forth the state's strategies for achieving the NAAQS. The SDAPCD is responsible for preparing and implementing the portion of the SIP applicable to the SDAB. The SIP plans for San Diego County specifically include the Redesignation Request and Maintenance Plan for the 1997 National Ozone Standard for San Diego

County (SDAPCD 2012), and the 2004 Revision to the California State Implementation Plan for Carbon Monoxide – Updated Maintenance Plan for Ten Federal Planning Areas (CARB 2004).

d. San Diego Air Pollution Control District

The SDAPCD is the agency that regulates air quality in the SDAB, and has prepared the RAQS in response to requirements set forth in the California CAA. The RAQS address state ozone standards and identifies measures to reduce ozone-forming emissions from stationary sources, such as industrial operations and manufacturing facilities. Individual measures in the RAQS are then developed into proposed air quality rules. As part of the RAQS, the SDAPCD developed TCMs consistent with program commitments made in the 2050 Regional Transportation Plan and the 2014 Regional Transportation Improvement Program adopted and implemented by the San Diego Association of Governments (SANDAG). The six TCMs are: (1) Transit Improvements; (2) Vanpools; (3) High-Occupancy Vehicle (HOV) Lanes; (4) Park-and-Ride Facilities; (5) Bicycle Facilities; and (6) Traffic Signal Improvements. The RAQS and TCM set forth the steps needed to accomplish attainment of the NAAQS and CAAQS. Updates of the RAQS and corresponding TCM are required every three years. The most recent update of the RAQS and TCM occurred in 2016.

4.14.3 Significance Determination Thresholds

The following criteria are used by the City of San Diego (City) to determine significance under California Environmental Quality Act related to air quality.

A project would have a significant environmental impact if the project would result in:

- 1. A conflict with or obstruction of implementation of the applicable air quality plan;
- 2. A violation of any air quality standard or substantial contribution to an existing or projected air quality violation;
- 3. A cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds of ozone precursors);
- 4. Exposure of sensitive receptors to substantial pollutant concentrations;
- 5. Creation of objectionable odors affecting a substantial number of people; and
- 6. Exceedence of 100 pounds per day of particulate matter (PM) dust.

In their Significance Determination Thresholds, the City has adopted emission thresholds based on the thresholds for an Air Quality Impact Assessment in the San Diego Air Pollution Control District's Rule 20.2. These thresholds are shown in Table 4.14-3.

Table 4.14-3 Air Quality Impact Screening Levels					
		Emission Rate			
Pollutant	Pounds/Hour	Pounds/Hour Pounds/Day Tons/Year			
NO _X	25	250	40		
SO_X	25	250	40		
CO	100 550 100				
PM ₁₀	-	100	15		
Lead	1	3.2	0.6		
VOC, ROG		137	15		
PM _{2.5} ^a		67	10		

SOURCE: Air Quality Analysis for the Morena Apartment Homes Project(RECON); SDAPCD, Rules 20.1, 20.2, 20.3; City of San Diego 2016. ^aThe City does not specify a threshold for PM_{2.5}. Threshold here is based on SDAPCD, Rules 20.1, 20.2, 20.3.

7. In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the State and Federal government as TACs or Hazardous Air Pollutants (HAPs). If a project has the potential to result in emissions of any TAC or HAP that may expose sensitive receptors to substantial pollutant concentrations, the project would be deemed to have a potentially significant impact. With regard to evaluating whether a project would have a significant impact on sensitive receptors, air quality regulators typically define sensitive receptors as schools (preschool to 12th grade), hospitals, resident care facilities, day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

4.14.4 Issue 1: Air Quality Plan Implementation

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

4.14.4.1 Impacts

The analysis of impacts under issue question 1 addresses Significance Determination Threshold 1 as detailed in Section 4.14.3, above.

The RAQS is the applicable regional air quality plan that sets forth the SDAPCD's strategies for achieving the NAAQS and CAAQS. The SDAB is designated non-attainment for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone. The two pollutants addressed in the RAQS are ROG and NOx, which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and by extension to maintaining and improving air quality. The RAQS, in conjunction with the TCM, were most recently adopted in 2009 as the air quality plan for the region.

The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by SANDAG

in the development of the regional transportation plans and sustainable communities strategy. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the general plan would not conflict with the RAQS. In the event that a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.

The northwestern parcel of the project site is currently designated as residential and the southeastern parcel is currently designated as commercial employment, retail, and services in the City General Plan. Although the proposed increase in density would be consistent with policy objectives of the City to focus density in proximity to transit, SANDAG growth projections used to develop the RAQS are based on current land use designations in the General Plan. The project would be consistent with the land use designation of the northwestern parcel. Under the commercial employment, retail, and services land use designation of the southeastern parcel, a range of commercial and retail uses could occur on-site. Development of land uses allowed under the existing plan would result in a much higher volume of vehicular trips than the project. Specifically, the proposed 150 multi-family project would generate approximately 900 gross average daily traffic (ADT; not accounting for existing trips). In comparison, the existing General Plan land use map identifies the site as residential and commercial employment, retail and services (refer to Figure 4.1-1) and the project base zones are RS-1-7 and CC-4-2, which would allow mixed-use development toward the project frontage and single-family residential within the area designated for residential use. As detailed in Chapter 9.0, Project Alternatives (see Figure 9-1), the existing plan could result in development of 24 single-family parcels, 17,500 square feet of ground floor commercial, and 15 apartments above the commercial. Based on the SANDAG vehicular generation rates for the San Diego region, 17,500 square feet of Specialty Retail/Strip Commercial uses would result in 700 ADT, 15 apartments would generate 90 ADT and 24 single-family residences would generate 240 ADT, for a total ADT of 1,030 (SANDAG 2002). Since the planned land uses would generate more traffic and associated vehicular emissions than the proposed project, the project's traffic generation and emissions would be within the existing assumptions accounted for in the RAQS. Therefore, the project would not obstruct or conflict with implementation of the RAQS, and impacts would be less than significant.

4.14.4.2 Significance of Impacts

The project would not result in impacts to air quality plan implementation based on the significance thresholds identified above. The project would generate fewer trips than what is currently accounted for in the growth forecast in the General Plan and would be consistent with the growth assumptions of the RAQS. Therefore, the project would not conflict with or obstruct implementation of the RAQS, and impacts would be less than significant.

4.14.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.14.5 Issue 2: Air Quality Violations

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

Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment?

4.14.5.1 Impacts

The analysis of impacts under issue question 2 addresses Significance Determination Thresholds 2 and 3 as detailed in Section 4.14.3, above.

a. Construction Emissions

Construction-related pollutants result from dust raised during demolition and grading, emissions from construction vehicles, and chemicals used during construction. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in Regulation 4, Rules 52, 54, and 55, of the SDAPCD's rules and regulations.

Heavy-duty construction equipment is usually diesel powered. In general, emissions from diesel-powered equipment contain more NO_X , SO_X , and particulate matter than gasoline-powered engines. However, diesel-powered engines generally produce less CO and less ROG than do gasoline-powered engines. Standard construction equipment includes tractors/loaders/backhoes, rubber-tired dozers, excavators, graders, cranes, forklifts, rollers, paving equipment, generator sets, welders, cement and mortar mixers, and air compressors.

Construction is anticipated to begin in December 2017 and last for approximately 18 months. Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Specific construction phasing and equipment parameters are not available at this time. However, CalEEMod can estimate the required construction equipment when project-specific information is unavailable. The estimates are based on surveys, performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District, of typical construction projects which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. Project construction would occur in five stages: site preparation, grading/excavation, building construction, paving, and application of architectural coatings.

Table 4.14-4 shows the total projected construction maximum daily emission levels for each criteria pollutant. As shown, project construction would not exceed the applicable regional emissions thresholds designed to provide limits below which project emissions would not significantly change regional air quality. Therefore, project construction would not result in regional emissions that

would exceed the NAAQS or CAAQS or contribute to existing violations, and construction impacts would be less than significant.

Table 4.14-4 Summary of Worst-Case Construction Emissions (pounds per day)						
			Pol	lutant		
Construction	ROG	NO _X	CO	SO _X	PM_{10}	PM _{2.5}
Demolition	4	43	24	0	3	2
Site Preparation	5	52	24	0	21	13
Grading	3	31	17	0	8	5
Building Construction	3	26	22	0	3	2
Paving	2	18	15	0	1	1
Architectural Coatings	106	2	2	0	0	0
Maximum Daily Emissions 106 52 24 0 21 13						
Significance Threshold	137	250	550	250	100	67

ROG = reactive organic gas; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = 10-micron particulate matter; $PM_{2.5}$ = 2.5-micron particulate matter

b. Operation Emissions

Mobile source emissions would originate from traffic generated by the project. Area source emissions associated with the project include consumer products, natural gas used in space and water heating, architectural coatings, and landscaping equipment. Table 4.14-5 provides a summary of the operational emissions generated by the project calculated using the CalEEMod model. As shown, project operation would not exceed the applicable regional emissions thresholds. Therefore, as project operation emissions would be well below these limits, project operation would not result in regional emissions that would exceed the NAAQS or CAAQS or contribute to existing violations, and impacts would be less than significant impact.

Table 4.14-5 Summary of Project Operational Emissions (pounds per day)						
		Pollutant				
Operation	ROG	NO _X	CO	SO _X	PM ₁₀	PM _{2.5}
Area Sources	4	0	12	0	0	0
Energy Sources	0	0	0	0	0	0
Mobile Sources	2	7	17	0	4	1
Total	6	7	30	0	4	1
Significance Threshold	137	250	550	250	100	67
NOTE: Totals may yang dua to independent rounding						

NOTE: Totals may vary due to independent rounding.

ROG = reactive organic gas; NO_X = nitrogen oxides; CO = carbon

monoxide; SO_X = sulfur oxides; PM_{10} = 10-micron particulate matter;

 $PM_{25} = 2.5$ -micron particulate matter

c. Non-Attainment

The region is classified as attainment for all criterion pollutants except ozone, PM_{10} , and $PM_{2.5}$. The SDAB is non-attainment for the 8-hour federal and state ozone standards. Ozone is not emitted directly, but is a result of atmospheric activity on precursors. NO_X and ROG are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone.

As shown in Tables 4.14-4 and 4.14-5, emissions of ozone precursors (ROG and NO_X), PM_{10} , and $PM_{2.5}$ from construction and operation would be below the applicable thresholds. Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM_{10} , or $PM_{2.5}$, and impacts would be less than significant.

4.14.5.2 Significance of Impacts

a. Construction Emissions

The project would not exceed construction emission levels based on the Significance Determination Threshold 2 identified above. As discussed above and shown in Table 4.14-4, maximum daily construction emissions are projected to be less than the applicable thresholds for all criterion pollutants, and construction impacts would be less than significant.

b. Operation Emissions

The project would not exceed operation emission levels based on the Significance Determination Threshold 2 identified above. As discussed above and shown in Table 4.14-5, future emissions due to operation of the project are projected to be less than the applicable significance thresholds for all pollutants, and operational impacts would be less than significant.

c. Non-Attainment

Based on the Significance Determination Threshold 3 identified above, implementation of the project would not result in a cumulatively considerable net increase in emissions of ozone, PM_{10} , or $PM_{2.5}$, and impacts would be less than significant.

4.14.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.14.6 Issue 3: Sensitive Receptors

Would the project expose sensitive receptors to substantial pollutant concentration including air toxics such as diesel particulates?

4.14.6.1 Impacts

The analysis of impacts under issue question 3 addresses Significance Determination Thresholds 4 and 8 as detailed in Section 4.14.3, above. Sensitive land uses include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. There are residential uses located south, east, and north of the project site.

a. Construction Diesel Particulate Matter

Construction of the project and associated infrastructure would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Construction of the project would result in the generation of diesel-exhaust diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities and on-road diesel equipment used to bring materials to and from the project site.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the project is anticipated to last for 18 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the maximally exposed individual. The risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were 12 months, the exposure would be less than 3 percent of the total exposure period used for health risk calculation.

Due to the limited duration of construction activity, DPM generated by project construction is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer for the maximally exposed individual or to generate ground-level concentrations of non-carcinogenic TACs that exceed a hazard index greater than 1 for the maximally exposed individual. Additionally, with ongoing implementation of U.S. EPA and CARB requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types, the DPM emissions of individual equipment continues to reduce over time. Therefore, project construction would not expose sensitive receptors to substantial pollutant concentration.

b. Carbon Monoxide Hot Spots

Localized CO concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. The SDAB is a CO maintenance area under the federal CAA. This means that SDAB was previously a non-attainment area and is currently implementing a 10-year plan for continuing to meet and maintain air quality standards. As a result, ambient CO levels have declined significantly. CO hot spots have been found to occur only at signalized intersections that operate at or below level of service (LOS) E with peak hour trips for that intersection exceeding 3,000 trips. Based on the traffic impact analysis (see Appendix D), the project would not result in a signalized intersection to operate at a LOS E or worse and would not contribute to a significant impact at existing LOS E or worse intersections. Therefore, the project would not be anticipated to result in a CO hot spot and localized air quality impacts to sensitive receptors would be less than significant.

c. Freeway Diesel Particulate Matter

In April 2005, CARB published the *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB 2005). The handbook makes recommendations directed at protecting sensitive land uses from air pollutant emissions while balancing a myriad of other land use issues (e.g., housing, transportation needs, economics, etc.). It notes that the handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. As reflected in the CARB Handbook, there is currently no adopted standard for the significance of health effects from mobile sources. Therefore, the CARB has provided guidelines for the siting of land uses near heavily traveled roadways. Of pertinence to this study, the CARB guidelines indicate that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles/day should be avoided when possible.

The project site is located adjacent to Interstate 5 (I-5). Potions of Buildings 1, 6, 8, and the proposed pool are located within 500 feet of I-5. However, measures have been incorporated into the project design that would reduce the level of exposure for future residents. The California Air Pollution Control Officers Association (CAPCOA) published a guidance document, *Health Risk Assessments for Proposed Land Use Projects*, that provides recommended measures that reduce concentrations of DPM (CAPCOA 2009). These include planting vegetation between the receptor and the freeway, constructing barriers between the receptor and the freeway, and installing newer electrostatic filters in adjacent receptor buildings. The risk to residences would be reduced by the inclusion of various project design features, including planting vegetation between the freeway and project site, construction of a wall around the pool area and along the frontage of the project site, and the provision of heating, ventilation, and air conditioning units with MERV-13, or better, air filters in each unit. The MERV-13 filters would remove particulates entering the indoor air, thus reducing cancer risk from diesel exhaust exposure. Therefore, with the inclusion of these design elements, the potential increase in cancer risk and the non-cancer chronic risks would be less than significant.

4.14.6.2 Significance of Impacts

Based on the significant thresholds identified above, construction and operation of the project would not expose sensitive receptors to substantial pollutant concentrations or result in the

emission of any TAC that may expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

4.14.6.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.14.7 Issue 4: Odor

Would the project create objectionable odors affecting a substantial number of people?

4.14.7.1 Impacts

The analysis of impacts under issue question 4 addresses Significance Determination Threshold 5 as detailed in Section 4.14.3, above. The project does not include heavy industrial or agricultural uses that are typically associated with odor complaints. During construction, diesel equipment may generate some nuisance odors. Sensitive receptors near the project site include residential uses to the south, east, and north; however, exposure to odors associated with project construction would be short term and temporary in nature and would not affect a substantial number of people. Impacts would be less than significant.

4.14.7.2 Significance of Impacts

Based on the significance threshold identified above exposure to odors associated with project construction would be short term and temporary in nature. Impacts would be less than significant.

4.14.7.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.14.8 Issue 5: Particulate Matter

Would the project exceed 100 pounds per day of particulate matter (dust)?

4.14.8.1 Impacts

The analysis of impacts under issue question 5 addresses Significance Determination Threshold 6 as detailed in Section 4.14.3, above. Fugitive dust is any solid particulate matter that becomes airborne directly or indirectly as a result of the activities of man or natural events (such as windborne dust), other than that emitted from an exhaust stack. Construction dust is comprised primarily of chemically inert particles that are too large to enter the human respiratory tract when inhaled.

Construction-related pollutants result from dust raised during demolition and grading, emissions from construction vehicles, and chemicals used during construction. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the

soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in Regulation 4, Rules 52, 54, and 55, of the SDAPCD's rules and regulations. As shown in Table 4.14-4, construction of the project would not result in PM_{10} emissions exceeding 100 pounds per day. Additionally, fugitive dust emissions were calculated using CalEEMod default values, and did not take into account the required dust control measures. Thus, the emissions shown in Table 4.14-4 are conservative and could be less when dust control measures are implemented. As shown in Table 4.14-5, operation of the project would not result in PM_{10} emissions exceeding 100 pounds per day.

4.14.8.2 Significance of Impacts

Based on the significance threshold identified above construction and operation of the project would not result in PM_{10} emissions exceeding 100 pounds per day. Impacts would be less than significant.

4.14.8.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.15 Greenhouse Gas Emissions

This section addresses effects of the project with regard to global climate change. In December 2015, the City adopted a Climate Action Plan (CAP) that outlines the actions that the City of San Diego (City) will undertake to achieve its proportional share of state greenhouse gas (GHG) emission reductions. In conjunction with the CAP, the City requires all projects to prepare a CAP Consistency Checklist to show that measures required by the CAP are implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. The CAP Consistency Checklist for the Morena Apartment Homes Project is included as Appendix K.

4.15.1 Existing Conditions

To evaluate the incremental effect of the project on statewide GHG emissions and global climate change, it is important to have a basic understanding of the nature of the global climate change problem. Global climate change is a change in the average weather of the earth, which can be measured by wind patterns, storms, precipitation, and temperature. The earth's climate is in a state of constant flux with periodic warming and cooling cycles. Extreme periods of cooling are termed "ice ages," which may then be followed by extended periods of warmth. For most of the earth's geologic history, these periods of warming and cooling have been the result of many complicated interacting natural factors that include: volcanic eruptions that spew gases and particles (dust) into the atmosphere; the amount of water, vegetation, and ice covering the earth's surface; subtle changes in the earth's orbit; and the amount of energy released by the sun (sun cycles). However, since the beginning of the Industrial Revolution around 1750, the average temperature of the earth has been increasing at a rate that is faster than can be explained by natural climate cycles alone.

With the Industrial Revolution came an increase in the combustion of carbon-based fuels such as wood, coal, oil, natural gas, and biomass. Industrial processes have also created emissions of substances not found in nature. This in turn has led to a marked increase in the emissions of gases shown to influence the world's climate. These gases, termed "greenhouse" gases, influence the amount of heat trapped in the earth's atmosphere. Because recently observed increased concentrations of GHGs in the atmosphere are related to increased emissions resulting from human activity, the current cycle of "global warming" is generally believed to be largely due to human activity. Of late, the issue of global warming or global climate change has arguably become the most important and widely debated environmental issue in the United States and the world. The collective of human actions taking place throughout the world contributes to climate change; thus, it is a global or cumulative issue.

4.15.1.1 GHGs of Primary Concern

There are numerous GHGs, both naturally occurring and manmade. Table 4.15-1 summarizes some of the most common. Each GHG has variable atmospheric lifetime and global warming potential (GWP). The atmospheric lifetime of the GHG is the average time a molecule stays stable in the atmosphere. Most GHGs have long atmospheric lifetimes, staying in the atmosphere hundreds or thousands of years. The potential of a gas to trap heat and warm the atmosphere is measured by its GWP. The reference gas for establishing GWP is carbon dioxide (CO₂), which has a GWP of 1. As an example, methane (CH₄), while having a shorter atmospheric lifetime than CO₂, has a 100-year GWP of 28, which means that it has a greater global warming effect than CO₂ on a molecule-by-molecule basis. Specifically, GWP is defined as the cumulative radiative forcing—both direct and indirect effects—integrated over a period of time from the emission of a unit mass of gas relative to some reference gas (U.S. Environmental Protection Agency [EPA] 2010).

Table 4.15-1 Global Warming Potentials and Atmospheric Lifetimes (years)						
	Atmospheric Lifetime	100-year	20-year			
Gas	(years)	GWP	GWP			
Carbon dioxide (CO ₂)	50-200	1	1			
Methane (CH ₄)	12.4	28	84			
Nitrous oxide (N ₂ O)	121	265	264			
HFC-23	222	12,400	10,800			
HFC-32	5.2	677	2,430			
HFC-125	28.2	3,170	6,090			
HFC-134a	13.4	1,300	3,710			
HFC-143a	47.1	4,800	6,940			
HFC-152a	1.5	138	506			
HFC-227ea	38.9	3,350	5,360			
HFC-236fa	242	8,060	6,940			
HFC-43-10mee	16.1	1,650	4,310			
CF ₄	50,000	6,630	4,880			
C_2F_6	10,000	11,100	8,210			
C ₃ F ₈	2,600	8,900	6,640			
C ₄ F ₁₀	2,600	9,200	6,870			
c-C ₄ F ₈	3,200	9,540	7,110			
C_5F_{12}	4,100	8,550	6,350			
C_6F_{14}	3,100	7,910	5,890			
SF ₆	3,200	23,500	17,500			
SOURCE: Intergovernmental Panel on Climate Change (IPCC) 2014.						

SOURCE: Intergovernmental Panel on Climate Change (IPCC) 2014. GWP = global warming potential

It should be noted that the U.S. EPA and other organizations will update the GWP values they use occasionally. This change can be due to updated scientific estimates of the energy absorption or lifetime of the gases or to changing atmospheric concentrations of GHGs that result in a change in the energy absorption of one additional ton of a gas relative to another. The GWPs shown in Table 4.15-1 are the most current. However, it should be noted that in the California Emissions

Estimator Model (CalEEMod), the 100-year GWP for CH_4 and N_2O (nitrous oxide) are 21 and 310, respectively. These CalEEMod values are used for this analysis.

All of the gases in Table 4.15-1 are produced by both biogenic (natural) and anthropogenic (human) sources. The GHGs of primary concern in this analysis are CO_2 , CH_4 , and N_2O . CO_2 would be emitted by the project due to the combustion of fossil fuels in vehicles (including construction), from electricity generation and natural gas consumption, water use, and from solid waste disposal. Smaller amounts of CH_4 and nitrous oxide (N_2O) would be emitted from the same project operations.

4.15.1.2 State and Regional GHG Inventories

The California Air Resources Board (CARB) performs statewide GHG inventories. The inventory is divided into broad sectors of economic activity: electricity generation, transportation, industrial, commercial, residential, and agriculture and forestry. Emissions are quantified in million metric tons of CO_2 equivalent (MMT CO_2E). Table 4.15-2 shows the estimated statewide GHG emissions for the years 1990, 2010, and 2014. Although annual GHG inventory is available, these years are highlighted in Table 4.15-2 because 1990 is the baseline year for established reduction targets, 2010 corresponds to the same years for which inventory data for the City is available, and 2014 is the most recent data available.

Table 4.15-2					
California GHG Emissions by Sector in 1990, 2010, and 2014 ¹					
	1990 Emissions	2010 Emissions	2014 Emissions in		
	in MMT CO₂E	in MMT CO₂E	MMT CO ₂ E		
Sector	(% total) ²	(% total) ^{2,3}	(% total) ^{2,3}		
Electricity Generation	110.6 (25.9%)	90.6 (20.4%)	88.4 (20.0%)		
Transportation	150.7 (35.3%)	166.2 (37.3%)	163.0 (36.9%)		
Industrial	103.0 (24.2%)	100.9 (22.7%)	104.2 (23.6%)		
Commercial	14.4 (3.4%)	20.2 (4.5%)	21.6 (4.9%)		
Residential	29.7 (7.0%)	31.4 (7.1%)	27.4 (6.2%)		
Agriculture and Forestry	16.9 (4.0%)	34.9 (7.8%)	36.1 (8.2%)		
Not Specified	1.3 (0.3%)	0.8 (0.2%)	0.8 (0.2%)		
TOTAL ⁴	426.6	445.0	441.5		

SOURCE: CARB 2007 and 2016a.

MMT CO_2E = million metric tons of CO_2 equivalent

As shown in Table 4.15-2, statewide GHG source emissions totaled approximately 427 MMT CO₂E in 1990, 445 MMT CO₂E in 2010, and 442 MMT CO₂E in 2014. Many factors affect year-to-year changes

¹1990 data was obtained from the CARB 2007 source and are based on Intergovernmental Panel on Climate Change (IPCC) second assessment report global warming potentials (GWPs). The revised calculation, which uses the scientifically updated IPCC fifth assessment report GWPs, is 431 MMT CO₂E.

²Percentages may not total 100 due to rounding.

³2010 and 2014 data was retrieved from the CARB 2016a source.

⁴Totals may vary due to independent rounding.

in GHG emissions, including economic activity, demographic influences, environmental conditions such as drought, and the impact of regulatory efforts to control GHG emissions. Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions.

A San Diego emissions inventory was prepared for baseline year 2010 as a part of the City's CAP. The total community-wide GHG emissions in 2010 were 12,984,993 MT CO_2E . Table 4.15-3 summarizes the sources and quantities of community emissions. The largest source of emissions is transportation, followed by electricity, natural gas, solid waste and wastewater, and water.

Table 4.15-3				
City of San Diego GHG Emissions in 2010				
	2010 GHG Emissions			
Sector	(MT CO ₂ E)			
Transportation	7,141,746 (55%)			
Electricity	3,116,398 (24%)			
Natural Gas	2,077,599 (16%)			
Solid Waste and Wastewater	389,550 (3%)			
Water	259,700 (2%)			
TOTAL	12,984,993			
SOURCE: City of San Diego 2015.				

4.15.1.3 On-site Greenhouse Gas Emission Sources

The project site is currently developed with the Coastal Trailer Villa recreational vehicle (RV) park and residential uses. Current sources of on-site GHG emissions are associated with the vehicle and RV use, energy use, water use, area sources (landscaping and other equipment use) and solid waste disposal.

4.15.2 Regulatory Framework

In response to rising concern associated with increasing GHG emissions and global climate change impacts, several plans and regulations have been adopted at the federal, state, and local levels with the aim of reducing GHG emissions. The following is a discussion of the federal, state, and local plans and regulations most applicable to the project.

4.15.2.1 Federal

a. Environmental Protection Agency

The U.S. EPA has many federal level programs and projects to reduce GHG emissions. The U.S. EPA provides technical expertise and encourages voluntary reductions from the private sector. One of the voluntary programs is the Energy Star program that promotes energy-efficient products and practices. Tools and initiatives include the Energy Star Portfolio Manager, which helps track and assess energy and water consumption across an entire portfolio of buildings, and the Energy Star

Most Efficient 2013, which provides information on exceptional products that represent the leading edge in energy-efficient products in the year 2013 (U.S. EPA 2013).

The U.S. EPA also collaborates with the public sector, including states, tribes, localities, and resource managers, to encourage smart growth, sustainability preparation, and renewable energy and climate change preparation. These initiatives include the Clean Energy-Environment State Partnership Program, the Climate Ready Water Utilities Initiative, the Climate Ready Estuaries Program, and the Sustainable Communities Partnership (U.S. EPA 2014).

b. Corporate Average Fuel Economy Standards

The project would generate additional vehicle trips. These vehicles would consume fuel and would result in GHG emissions. The federal Corporate Average Fuel Economy (CAFE) standards determine the fuel efficiency of certain vehicle classes in the United States. The standards were initially established in 1975. As part of the Energy and Security Act of 2007, the CAFE standards were increased in 2007 for new light-duty vehicles to 35 miles per gallon (mpg) by 2020. In May 2009, plans were announced to further increase CAFE standards to require light-duty vehicles to meet an average fuel economy of 35.5 mpg by 2016. In August 2012, fuel economy standards were further increased to 54.5 mpg for cars and light-duty trucks by model year 2025. This will nearly double the fuel efficiency of those vehicles compared to new vehicles currently on our roads. With improved gas mileage, fewer gallons of transportation fuel would be combusted to travel the same distance, thereby reducing nationwide GHG emissions associated with vehicle travel.

4.15.2.2 State

The State of California has adopted a number of plans and regulations aimed at identifying statewide and regional GHG emissions caps, GHG emissions reduction targets, and actions and timelines to achieve the target GHG reductions.

a. Executive Order S-3-05

Executive Order (EO) S-3-05 established the following GHG emission reduction targets for the State of California:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020 reduce GHG emissions to 1990 levels;
- By 2050 reduce GHG emissions to 80 percent below 1990 levels.

This EO also directs the secretary of the California EPA to oversee the efforts made to reach these targets, and to prepare biannual reports on the progress made toward meeting the targets and on the impacts to California related to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. The EO also requires reporting on mitigation and adaptation plans to combat the impacts of climate change. The first Climate Action Team Assessment Report was produced in March 2006, and has been updated every two years.

b. Executive Order B-30-15

This EO, issued on April 29, 2015, establishes an interim GHG emission reduction goal for the state of California by 2030 of 40 percent below 1990 levels. This EO also directed all state agencies with jurisdiction over GHG emitting sources to implement measures designed to achieve the new interim 2030 goal as well as the pre-existing long-term 2050 goal identified in EO S-3-05. Additionally, this EO directed CARB to update its Climate Change Scoping Plan to address the 2030 goal.

c. California Global Warming Solutions Act

In response to EO S-3-05, the California Legislature passed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, and thereby enacted Sections 38500–38599 of the California Health and Safety Code. The heart of AB 32 is its requirement that CARB establish an emissions cap and adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020. AB 32 also required CARB to adopt a plan by January 1, 2009, indicating how emission reductions would be achieved from significant GHG sources via regulations, market mechanisms, and other actions.

Approved in September 2016, Senate Bill (SB) 32 updates the California Global Warming Solutions Act of 2006 and enacts EO B-30-15. Under SB 32, the state is required to reduce its GHG emissions 40 percent below 1990 levels by 2030. In implementing the 40 percent reduction goal, CARB is required to prioritize emissions reductions and to consider the social costs of the emissions of GHGs. The term "social costs" is defined as "an estimate of the economic damages, including, but not limited to, changes in net agricultural productivity; impacts to public health; climate adaptation impacts, such as property damages from increased flood risk; and changes in energy system costs, per metric ton of greenhouse gas emission per year."

d. Climate Change Scoping Plan

As directed by the California Global Warming Solutions Act of 2006, in 2008, CARB adopted the Climate Change Scoping Plan: A Framework for Change (Scoping Plan), which identifies the main strategies California will implement to achieve the GHG reductions necessary to reduce forecasted business as usual (BAU) emissions in 2020 to the state's historic 1990 emissions level (CARB 2008). In January 2017, CARB released The 2017 Climate Change Scoping Plan Update, The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target (Proposed Second Update to the Scoping Plan; CARB 2017a). The comment period for the Proposed Second Update to the Scoping Plan ended in March 2017. The Proposed Second Update to the Scoping Plan identifies the state strategy for achieving the state's 2030 reduction target. The plan proposes to build on existing programs such as the Cap-and-Trade Regulation, Low Carbon Fuel Standard (LCFS), Advanced Clean Cars (ACC) Program, Renewable Portfolio Standard (RPS), Sustainable Communities Strategy, and the Short-Lived Climate Pollutant Reduction Strategy. It also proposes further strategies to reduce waste emissions through cogeneration, reduce GHG emissions from the refinery sector by 20 percent, and new policies to address GHG emissions from natural and working lands.

e. Transportation Related Measures

California Advanced Clean Car Program

The ACC Program, adopted January 2012, combines the control of smog, soot-causing pollutants, and GHG emissions into a single coordinated package of requirements for model years 2015 through 2025. AB 1493 (Pavley) directed CARB to adopt vehicle standards that lowered GHG emissions from passenger vehicles and light-duty trucks to the maximum extent technologically feasible, beginning with the 2009 model year. Accordingly, the ACC Program coordinates the goals of the Pavley, low emissions vehicle, zero emission vehicle, and Clean Fuels Outlet programs in order to lay the foundation for the commercialization and support of these ultra-clean vehicles. CARB has adopted amendments to its regulations that would enforce AB 1493 but provide vehicle manufacturers with new compliance flexibility. CARB has also adopted a second phase of the Pavley regulations, originally termed "Pavley II" but now called the Low Emission Vehicle III" (LEV III) Standards or ACC Program, that covers model years 2017 to 2025. CARB estimates that LEV III will reduce vehicle GHGs by an additional 4.0 million MT CO₂E for a 2.4 percent reduction over Pavley. These reductions come from improved vehicle technologies such as smaller engines with superchargers, continuously variable transmissions, and hybrid electric drives. On August 7, 2012, the final regulation for the adoption of LEV III became effective.

EO S-01-07—Low Carbon Fuel Standard

EO S-01-07 directed that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 through a LCFS. LCFS promotes the use of GHG-reducing transportation fuels, e.g., liquid biofuels, renewable natural gas, electricity, and hydrogen, through a declining carbon intensity standard. The carbon intensity of a fuel is a measure of the GHG emissions associated with the production, distribution, and consumption of a fuel. CARB approved LCFS in 2009 and implemented it in 2010 as an early action measure under AB 32. Subsequently CARB approved amendments to the LCFS, which began implementation on January 1, 2013. Due to a court ruling that found procedural issues related to the original adoption of the LCFS, CARB re-adopted the LCFS regulation in September 2015, which went into effect on January 1, 2016. The program establishes a strong framework to promote the low carbon fuel adoption necessary to achieve the governor's 2030 and 2050 GHG goals (CARB 2016b).

Senate Bill 375—Regional Emissions Targets

Senate Bill 375, the 2008 Sustainable Communities and Climate Protection Act, was signed into law in September 2008 and requires CARB to set regional targets for reducing passenger vehicle GHG emissions in accordance with the Scoping Plan. Its purpose is to align regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation to reduce GHG emissions by promoting high-density, mixed-use developments around mass transit hubs. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy or Alternative Planning Strategy to address GHG reduction targets from cars and light-duty trucks in the context of that MPO's Regional Transportation Plan. The San Diego Association of Governments (SANDAG) is the San Diego region's MPO. The currently adopted CARB targets for the SANDAG region require a 7 percent reduction in GHG emissions per capita from automobiles and

light-duty trucks compared to 2005 levels by 2020, and a 13 percent reduction by 2035. The proposed updated targets for the SANDAG region require a 15 percent reduction by 2020 and a 21 percent reduction by 2035 (CARB 2017b).

Tire Pressure Program

The purpose of this regulation is to reduce GHG emissions from vehicles operating with inflated tires by inflating them to the recommended tire pressure rating. Automotive service providers, among other requirements, must check and inflate each vehicle's tires to the recommended tire pressure rating at the time of performing any automotive maintenance or repair service; indicate on the vehicle service invoice that a tire inflation service was completed and the tire pressure measurements after the service were performed; and keep a copy of the service invoice for a minimum of three years and make the vehicle service invoice available to the CARB or its authorized representative upon request.

f. Non-Transportation Related Measures

In the energy sector, the Scoping Plan measures aim to provide better information and overcome institutional barriers that slow the adoption of cost-effective energy-efficiency technologies. They include enhanced energy-efficiency programs to provide incentives for customers to purchase and install more efficient products and processes, and building and appliance standards to ensure that manufacturers and builders bring improved products to market. Over the long term, the recommended measures will increase the amount of electricity from renewable energy sources and improve the energy efficiency of industries, homes, and buildings. While energy-efficiency accounts for the largest emissions reductions from this sector, other applicable land development measures—such as water conservation materials use and waste reduction, and green building design and development practices—achieve additional emissions reduction. The project would result in additional non-transportation-related GHG emissions. The following is a discussion of those applicable to the project.

Renewables Portfolio Standard

The RPS promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020, the goal has been accelerated and increased to a goal of 33 percent by 2020 and 50 percent by 2030. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Increasing the RPS to 33 percent accelerates the transformation of the electricity sector, including investment in the transmission infrastructure and systems changes to allow integration of large quantities of intermittent wind and solar generation. Increased use of renewables would decrease California's reliance on fossil fuels, thus reducing emissions of GHGs from the electricity sector.

California Code of Regulations, Title 24, Part 6—California Energy Code

The California Code of Regulations, Title 24, Part 6 is the Energy Efficiency Standards or California Energy Code. This code establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is updated

periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. The most current version of the Energy Code, the 2016 Energy Code became, effective January 1, 2017.

As identified by the California Energy Commission (CEC), the 2013 version, compared to the 2008 Title 24 requirements, results in 23.3 percent reduction in electricity demand and a 3.8 percent reduction in natural gas use from multi-family developments, and a 21.8 percent reduction in electricity demand and a 16.8 percent reduction in natural gas demand from non-residential developments (CEC 2013). Until the 2016 Title 24 requirements take effect, the CEC cannot complete a comprehensive study characterizing the resulting electricity demand and natural gas use reductions. However, preliminary CEC estimates indicate that residences built consistent with 2016 Title 24 requirements will be 28 percent more energy efficient than homes built consistent with 2013 Title 24 requirements and non-residential use built consistent with 2016 Title 24 requirements will be 5 percent more energy efficient than those built consistent with 2013 Title 24 requirements (CEC 2015).

New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The compliance reports must demonstrate a building's energy performance through the use of California Energy Commission-approved energy performance software that shows iterative increases in energy efficiency given selection of various heating, ventilation, and air conditioning; sealing; window glazing; insulation; and other components related to the building envelope. Title 24 governs energy consumed by the major building envelope systems such as space heating, space cooling, water heating, some aspects of the fixed lighting system, and ventilation. Non-building energy use, or "plug-in" energy use (such as appliances, equipment, electronics, plug-in lighting), are independent of building design and are not subject to Title 24.

California Code of Regulations, Title 24, Part 11—California Green Building Standards

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Code). CALGreen instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial and low-rise residential buildings and state-owned buildings, schools, and hospitals. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory requirements and may adopt CALGreen with amendments for stricter requirements.

The mandatory standards require:

- 20 percent mandatory reduction in indoor water use relative to specified baseline levels;
- 50 percent construction/demolition waste diverted from landfills;
- Mandatory inspections of energy systems to ensure optimal working efficiency;

- Requirements for low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards;
- Dedicated circuitry to facilitate installation of electric vehicle charging stations in newly constructed attached garages for single-family and duplex dwellings; and
- Installation of electric vehicle charging stations at least 3 percent of the parking spaces for all new multi-family developments with 17 or more units.

The voluntary standards include:

- Tier I—15 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 65 percent reduction in construction waste, 10 percent recycled content, 20 percent permeable paving, 20 percent cement reduction, cool/solar reflective roof; and
- Tier II—30 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 75 percent reduction in construction waste, 15 percent recycled content, 30 percent permeable paving, 30 percent cement reduction, cool/solar reflective roof.

Similar to the compliance reporting procedure described above for demonstrating code compliance under Title 24 Part 6, in new buildings and major renovations, compliance with the CALGreen water reduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings. The water use compliance form must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water-use rate.

4.15.2.3 Local

a. City of San Diego General Plan

The City General Plan includes several climate change-related policies aimed at reducing GHG emissions from future development and City operations. For example, Conservation Element policy CE-A.2 aims to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth" related to climate change. The Land Use and Community Planning Element; Mobility Element; Urban Design Element; and Public Facilities, Services, and Safety Element also identify GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency. The overall intent of these policies is to support climate protection actions, while retaining flexibility in the design of implementation measures, which could be influenced by new scientific research, technological advances, environmental conditions, or state and federal legislation.

b. City of San Diego Climate Action Plan

In December 2015, the City adopted its CAP (City of San Diego 2015). The CAP identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a BAU projection for emissions at 2020 and 2035, state targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy-and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency. Accounting for future population and economic growth, the City projects GHG emissions will be approximately 15.9 MMT CO_2E in 2020 and 16.7 MMT CO_2E in 2035. To achieve its proportional share of the state reduction targets for 2020 (AB 32) and 2050 (EO S-3-05), the City would need to reduce emissions below the 2010 baseline by 15 percent in 2020 and 50 percent by 2035. To meet these goals, the City must implement strategies that reduce emissions to approximately 11.0 MMT CO_2E in 2020 and 6.5 MMT CO_2E in 2035. Through implementation of the CAP, the City is projected to reduce emissions even further below targets by 1.2 MMT CO_2E by 2020 and 205,462 MT CO_2E by 2035.

As a means to implement the CAP, the City created a Consistency Checklist utilized by projects to ensure compliance with the measures identified in the CAP. The Consistency Checklist includes three steps in evaluating if a project is consistent with the CAP. Step 1 of the CAP Consistency Checklist evaluates a project's consistency with the growth projections used in the development of the CAP. Projects that are consistent with the adopted General Plan and Community Plan land use and zoning designations, or projects that are not consistent with these designations but would result in an equivalent or less GHG-intensive project when compared to the existing designations, would be consistent with the growth projections used in development with the CAP. With implementation of the applicable project-specific measures identified in Step 2 of the checklist, these projects would be consistent with the CAP. A project that is not consistent with the existing land use and zoning designations and would result in a more GHG-intensive project may still be consistent with the CAP if it is located within a Transit Priority Area (TPA) and implements CAP Strategy 3 actions, as determined in Step 3.

Step 2 of the CAP Consistency Checklist is to review and evaluate a project's consistency with specific applicable strategies and actions of the CAP. Step 2 includes measures associated with cool/green roofs, plumbing fixtures and fittings, energy performance standards/renewable energy, electric vehicle charging, bicycle parking spaces, shower facilities, designated parking spaces, and a transportation demand management (TDM) program.

Step 3 of the CAP Consistency Checklist is to determine if a project that is located in a TPA but includes a land use plan and/or zoning designation amendment that would result in an increase in GHG emissions when compared to the existing designations, is nevertheless consistent with the assumptions in the CAP, because it would implement CAP Strategy 3 actions.

c. Sustainable Building Policies

In several of its policies, the City aims to reduce GHG emissions by requiring sustainable development practices in City operations and incentivizing sustainable development practices in private development. In Council Policy 900-14—Green Building Policy, Council Policy 900-16—

Community Energy Partnership, and the updated Council Policy 900-14—Sustainable Buildings Expedite Program, the City establishes a mandate for all City projects to achieve the U.S. Green Building Council's Leadership in Energy and Environmental Design Silver standard for all new buildings and major renovations over 5,000 square feet. Incentives are also provided to private developers through the Expedite Program, which expedites project review of green building projects and discounts project review fees.

The City has also enacted codes and policies aimed at helping the City achieve the state's 50 percent waste diversion mandate, including: the Refuse and Recyclable Materials Storage Regulations (Municipal Code Chapter 14, Article 2, Division 8), Recycling Ordinance (O-19678 Municipal Code Chapter 6, Article 6, Division 7), and the Construction and Demolition Debris Deposit Ordinance (O-19420 & 0-19694 Municipal Code Chapter 6, Article 6, Division 6). In 2011, the target for waste diversion was increased in AB 341 from 50 percent to 75 percent. The goal is a statewide goal, but the state agency imposed requirements on local governments to move toward this goal through mandatory recycling ordinances. See also Section 4.13.2.2 for more details regarding solid waste regulations.

4.15.3 Significance Determination Thresholds

Based on the City's 2016 Significance Determination Thresholds and applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G, impacts related to greenhouse gas emissions would be significant if the project would:

- 1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- 2. Conflict with the City's CAP or an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs.

Pursuant to CEQA Guidelines Sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan. Consistent with CEQA Guidelines Section 15183.5(b)(1)(A-F), the City's CAP is a qualified GHG reduction plan. Consistency with the City's CAP is determined for individual development projects through completion of the CAP Consistency Checklist and application of binding and enforceable project requirements that implement the CAP.

4.15.4 Issue 1: Greenhouse Gas Emissions

Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

4.15.4.1 Impacts

The CAP quantifies existing GHG emissions as well as projected emissions for the years 2020, 2030, and 2035 resulting from activities within the City's jurisdiction and identifies City target emissions

levels, below which the Citywide GHG impacts would be less than significant. Subsequent to the adoption of the CAP, the City has also established additional specific measures that if implemented on a project-by-project basis, would further ensure that the City as a whole achieves the specified GHG emissions reduction targets identified in the CAP. As further detailed in Section 4.15.5, the project would be consistent with the CAP as detailed in the CAP Consistency Checklist. The project would incorporate project features to minimize GHG emissions, and specific project requirements detailed in the CAP Consistency Checklist would become project conditions of approval. Project compliance with the City's CAP and the requirements of the CAP Consistency Checklist ensures that the project would not generate greenhouse gas emissions that would have a significant impact on the environment. Impacts would be less than significant.

4.15.4.2 Significance of Impacts

The project would be consistent with the goals and strategies of the CAP (see Section 4.15.5 below) and enforceable conditions of the CAP Consistency Checklist that ensures project GHG emissions would be less than significant.

4.15.4.3 Mitigation, Monitoring, and Reporting

Impacts are less than significant. No mitigation is required.

4.15.5 Issue 2: Conflicts with the CAP or other Plans or Policies

Would the project conflict with the City's CAP or an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs?

4.15.5.1 Impacts

The regulatory plans and policies discussed in Section 4.15.2 aim to reduce national, state, and local GHG emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. Plan goals and regulatory standards are, thus, largely focused on the automobile industry and public utilities. For the transportation sector, the reduction strategy is generally three-pronged: to reduce GHG emissions from vehicles by improving engine design; to reduce the carbon content of transportation fuels through research, funding, and incentives to fuel suppliers; and to reduce the miles these vehicles travel through land use change and infrastructure investments. For the energy sector, the reduction strategies aim to reduce energy demand, impose emission caps on energy providers, establish minimum building energy and green building standards, transition to renewable non-fossil fuels, incentivize homeowners and builders, fully recover landfill gas for energy, and expand research and development.

a. Consistency with State Plans

EO S-3-05 establishes GHG emission reduction targets for the state, and AB 32 launched the Climate Change Scoping Plan that outlines the reduction measures needed to reach these targets. The City

has adopted a qualified GHG emission reduction plan that outlines an approach to reach the state Scoping Plan GHG reduction targets. Thus, project consistency with the City's CAP would ensure consistency with state plans. Project construction and operation would be required to include all mandatory green building measures under the CALGreen Code and all requirements of the CAP Consistency Checklist. Therefore, the project would be consistent with the Scoping Plan measures through incorporation of stricter building and appliance standards and measures identified in the CAP Consistency Checklist that identify project consistency with the City's CAP.

b. Consistency with Local Plans

City of San Diego General Plan

The project would implement the City General Plan City of Villages strategy by intensifying residential uses at the project site, which is identified as having a medium propensity for village development in the General Plan Land Use Element (see Figure 4.1-2). The project would implement the City of Villages strategy by locating high-density residential uses in proximity to high-quality transit including a high-frequency bus line (Route 105 [Old Town to University Town Center; UTC]), which runs between the Old Town Transit Center and the UTC Transit Center via Morena Boulevard and Clairemont Drive. Additionally, the project would be located in proximity to the planned Tecolote Trolley/Light Rail Transit station proposed under the Mid-Coast Corridor Transit Project Trolley Blue Line Extension.

City of San Diego Climate Action Plan

Project Consistency with City CAP

The CAP establishes five primary strategies for achieving the goals of the plan. Many of these strategies are specific to City operations; however, there are strategies that could apply to general development projects. The project prepared a CAP Consistency Checklist, which identifies specific features that are required to be implemented as part of the project. These measures reflect the project's consistency with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. The project would be consistent with the CAP, as determined by completion of the CAP Consistency Checklist (see Appendix K), as detailed below:

Step 1: Land Use Consistency - The first step in determining CAP consistency for discretionary development projects is to assess the project's consistency with the growth projections used in the development of the CAP. The project would not be consistent with the land use designations of the existing general and community plans. The project requires approval of a Community Plan Amendment, Rezone, Vesting Tentative Map, Planned Development Permit, and Site Development Permit to rezone the site from CC-4-2/RS-1-7 to RM-2-5, to remove the mobile home overlay, and to consolidate two lots for the construction of 150 multi-family dwelling units. The project would result in greater density than used in development of the CAP and, therefore, an increase in GHG emissions when compared to the existing land use designations; however, the project is located in a TPA and would implement CAP Strategy 3 actions, as discussed in the Step 3 discussion below.

Step 2: CAP Strategies Consistency – The second step of the CAP consistency review is to review and evaluate a project's consistency with the applicable strategies and actions of the CAP.

- Strategy 1 (Energy and Water-Efficient Buildings) includes goals, actions, and targets with the aim of reducing building energy consumption, including reduction of daily per capita water consumption. The project includes project design features aimed at sustainability and conservation of energy. As identified in the CAP Consistency Checklist, these design features include the following:
 - o Cool roofs utilizing a combination of (1) roofing materials with a minimum 3-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under the CALGreen Code, and (2) roof construction having a thermal mass over the roof membrane, including areas of vegetated (green) roofs, weighing at least 25 pounds per square foot as specified in the voluntary measures under the California Green Building Standards Code.
 - o Low-flow fixtures/appliances consistent with the standards of residential buildings.
 - o Smart irrigation controllers to provide landscape watering only when needed.
- Strategy 2 (Clean and Renewable Energy) includes goals for passive or zero net energy use
 for new building design. Project design would include a 15 percent improvement in energy
 performance compared to the Title 24, Part 6 Energy Budget for the Proposed Design
 Building as calculated by Compliance Software certified by the California Energy
 Commission. Additionally, the project would incorporate the following energy efficiency
 measures:
 - 100 percent light-emitting diode (LED) lights.
 - o Low-e dual-pane windows that minimize heat loss in winter and heat gain in summer.
 - o Insulation in exterior walls up to R-19.
 - EnergyStar appliance in all units.
 - Home Efficiency Rating System (HERS) testing for low leakage testing and building commissioning for installed energy-consuming systems to verify systems operation to their rated operational efficiency.
- Strategy 3 (Bicycling, Walking, Transit, and Land Use) has a number of goals that relate to land use and planning. As identified in the CAP Consistency Checklist, 3 percent of the total parking spaces provided on-site (eight spaces) would provide a listed cabinet, box, or enclosure connected to a conduit linking the parking spaces to electrical service. Half of these spaces (four spaces) would have the necessary electrical vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents. Additionally, the project would promote walkability by installing new accessible sidewalks along the project frontage along West Morena Boulevard, Morena Boulevard, and Frankfort Street. Internal walkways are provided throughout the project site providing access to onsite amenities and providing pedestrian connections to the surrounding roadways. The main pedestrian access point including an accessible ramp would be at the corner of Morena Boulevard and Frankfort Street. An additional pedestrian walkway provides access to Morena Boulevard near the right-in/right-out driveway. These pedestrian connections would facilitate future resident use of the surrounding transit opportunities including use of bus route 105 with a stop located at the project frontage at Morena Boulevard and use of the future trolley stop associated with the blue line extension at Tecolote Road.

Step 3: Project CAP Conformance Evaluation – A project that is not consistent with land use and zoning designations may still be consistent with the CAP if it is located within a TPA and implements CAP Strategy 3 actions, as determined in Step 3. The project site is located within a TPA and would implement CAP Strategy 3 actions detailed above. As detailed in the CAP Conformance Evaluation included as Step 3 of the CAP Consistency Checklist, the project would implement the City of Villages strategy by increasing residential density within a TPA with convenient transit access (bus route 150 and future trolley stop at Tecolote Road). The project site is located directly adjacent to and within walking distance to existing commercial uses that will be supported by the proposed multi-family residential use and would support pedestrian activity in the area. Internal walkways would be provided throughout the project site providing access to on-site amenities and providing pedestrian connections to the surrounding roadways. These pedestrian connections will facilitate future resident use of the surrounding transit opportunities and businesses.

The project would install new accessible sidewalks along the project frontage along West Morena Boulevard, Morena Boulevard, and Frankfort Street that will be supportive of pedestrian activity. Adequate frontage would be provided to allow for implementation of planned bicycle improvements within the vicinity. Overall, proposed roadway improvements would promote a balanced, multimodal, "complete streets" approach to accommodate mobility needs of all users. The project design includes 10 outdoor bicycle parking areas located close to each building that would accommodate space for up to 70 parked bicycles.

The project would incorporate approximately 318 trees throughout the project site and overall would provide approximately 1.63 acres of landscaped area. Overall, the project would contribute to the City's 20 percent urban canopy tree coverage goal. Landscaping, including larger trees, would be planted along the project frontage at Morena Boulevard, West Morena Boulevard, Frankfort Street, and Tonopah Avenue that would enhance the roadway corridor and the pedestrian realm.

As the project would be consistent with and would implement the CAP, impacts associated with GHG emissions would be less than significant.

4.15.5.2 Significance of Impacts

The project is consistent with all applicable goals and policies and aimed at reducing GHG emissions from land use and development, including the City's CAP, and would implement enforceable requirements from the CAP Checklist. Impacts would be less than significant.

4.15.5.3 Mitigation, Monitoring, and Reporting

Impacts related to GHG emissions would be less than significant. Thus, no mitigation is required.



Chapter 5.0 Significant Unavoidable Environmental Effects/Irreversible Changes

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(b) and (c) require that the significant unavoidable impacts of the project, as well as any significant irreversible environmental changes that would result from project implementation, be addressed in the Environmental Impact Report (EIR).

5.1 Significant Environmental Effects Which Cannot Be Avoided if the Project Is Implemented

In accordance with CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in the EIR. As discussed in Chapter 4.0, all significant impacts could be mitigated to below a level of significance and there are no significant environmental effects which cannot be avoided if the project is implemented. As discussed in Sections 4.4 and 4.5, the project would result in a significant impact related to potential disturbance to buried cultural or tribal cultural resources during grading that would be fully mitigated by the requirement for archaeological and Native American monitoring during ground disturbance. As discussed in Section 4.6, traffic circulation impacts along Morena Boulevard would be mitigated through the installation of adaptive signal control systems at three intersections along Morena Boulevard. Additionally, as discussed in Section 4.3, the project could result in a potentially significant impact to paleontological resources that would be mitigated through the requirement for paleontological monitoring during grading into bedrock. All significant impacts identified in Chapter 4.0 of this EIR would be reduced to below a

level of significance with the mitigation measures identified in Chapter 4.0 and in the Mitigation Monitoring and Reporting Program (Chapter 10.0).

5.2 Irreversible Environmental Changes Which Would Result if the Project Is Implemented

In accordance with CEQA Guidelines Section 15126.2(c):

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvements which provide access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Non-renewable resources generally include agricultural land, biological, archaeological and paleontological resources, mineral deposits, water bodies, and some energy sources. As evaluated in Chapter 8.0 of this EIR, implementation of the project would not result in significant irreversible impacts to agricultural resources, biological resources, or mineral resources. The project would have the potential to disturb archaeological and paleontological resources during grading activities; however, the requirement for a paleontological and archaeological monitor during grading activities would ensure that potentially buried resources are recovered.

Implementation of the project would require the irreversible consumption of natural resources and energy. Natural resource consumption would include lumber and other forest products, sand and gravel, asphalt, steel, copper, other metals, and water. Building materials, while perhaps recyclable in part at some long-term future date, would for practical purposes be considered permanently consumed. Energy derived from non-renewable sources, such as fossil and nuclear fuels, would be consumed during construction and operational lighting, heating, cooling, and transportation uses.

To minimize the use of energy, water, and other natural resources, the project would incorporate sustainable building practices into the site, architectural and landscape designs. As described in Section 3.3.8 of this EIR, design considerations aimed at improving energy efficiency and reducing water use have been incorporated into the project design and may serve to reduce irreversible water, energy, and building materials consumption associated with construction and occupation of the project. Further, the project will be required to comply with the requirements of the City of San Diego Climate Action Plan Consistency Checklist included as Appendix K and discussed in Section 4.15 of this EIR.



Chapter 6.0 Growth Inducement

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(d) requires that an EIR:

- 1. Discuss ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included are projects which would remove obstacles to population growth (for example, a major expansion of a waste water treatment plant might allow for more construction in service areas). Increases in the population might tax existing community services facilities, requiring construction of new facilities that could cause significant environmental effects.... It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. Induce substantial population growth in an area, (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the community plan).
- 2. Substantially alter the planned location, distribution, density, or growth rate of the population of an area.
- 3. Include extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvements Project list, when such infrastructure exceeds the needs of the project and could accommodate future developments.

The City of San Diego's (City's) 2016 Significance Determination Thresholds provide further guidance to determine potential significance for growth inducement. Based on the City's thresholds, a two-step analysis must be done to determine significance. The first step is to determine if the project is growth inducing. Growth-inducing projects are those that foster economic growth or population, or construct a new water or sewer line where none previously existed. The consequences of growth are then analyzed, for instance, whether existing infrastructure can accommodate the project and whether new facilities are required that may in turn result in significant impacts. As detailed in

Section 6.1 below, the project would not induce growth or remove any barriers to growth. As detailed in Section 6.2, existing public infrastructure is adequate to serve the project and no new facilities would be required to serve the project. Thus, the project is not growth inducing and no associated growth-inducing impacts would occur.

6.1 Population and Growth Projections

According to current San Diego Association of Governments (SANDAG) estimates, the population for the Clairemont Mesa Community Plan (CMCP) area is 78,981 (SANDAG 2016a). The CMCP area has 32,925 housing units, a majority of which are detached single-family units. The resulting average persons per household is 2.46.

Implementation of the project would require approval of a community plan amendment to allow for higher residential densities than currently allowed under the existing CMCP. While the project would increase the number of residential units that could be accommodated on the project site compared to the current planned land use, the project would accommodate existing growth and demand for housing. Further, the proposed densities would provide transit supportive land uses within a transit priority area, consistent with the City General Plan City of Villages Strategy and Climate Action Plan.

The project site is also located within an Existing/Planned Mixed-Use Transit Corridor (SD CM-7), a Smart Growth Opportunity Area identified on the SANDAG Smart Growth Concept Map (SANDAG 2016a). SANDAG identifies a target minimum density of 25 dwelling units per acre for this opportunity area in order to support existing and planned transit. The project density would be consistent with SANDAG target densities.

Thus, the project is considered to accommodate growth rather than induce growth. Construction of the project would not spur or remove barriers to growth in the area as the project area is already largely developed. While the project would exceed the land use density/intensity envisioned in the community plan, the project would not induce population and growth. Therefore, the project would not result in any adverse impacts associated with growth inducement.

6.2 Public Infrastructure

Because the project is located in an urbanized area surrounded by residential, commercial, and retail uses, and in proximity to Interstate 5 and the Los Angeles-San Diego-San Luis Obispo rail corridor, project implementation would not remove obstacles to population growth. The project does not propose the extension of any existing roads, and access would be obtained from existing roads surrounding the project site.

The project is limited to infill redevelopment for the construction of 150 market-rate multi-family units and would not construct any infrastructure facilities. Increased demand for fire protection and emergency medical services, police protection, and school services would not significantly burden existing community services facilities or require construction of new facilities that would cause significant environmental effects (see Section 4.12). The project site is located in an urbanized area that is already served by public infrastructure (e.g., water and sewer pipelines) with sufficient

capacity to support project buildout. Similarly, existing landfills have capacity to accommodate waste generated during construction and operation of the project (see Section 4.13). Therefore, the project would not extend roads or other infrastructure that exceeds the needs of the project that could accommodate future developments. The project would not result in any adverse impacts associated with growth inducement.

7

Chapter 7.0 Cumulative Impacts

California Environmental Quality Act (CEQA) Guidelines Section 15130(a) requires a discussion of cumulative impacts of a project "when the project's incremental effect is cumulatively considerable." Cumulatively considerable, as defined in CEQA Guidelines Section 15065(c), "means that the incremental effects of an individual 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." According to CEQA Guidelines Section 15130, the discussion of cumulative effects "need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness."

The following evaluation of cumulative impacts considers reasonably foreseeable projects in the vicinity of the project site. According to CEQA Guidelines Section 15130(b)(1), the discussion of cumulative effects is to be based on either (a) "a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those impacts outside the control of the agency," or (b) "a summary of projections contained in an adopted plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency."

The basis of and geographic area for the analysis of cumulative impacts is dependent on the nature of the issue. For this analysis, where evaluation of potential cumulative impacts are localized (e.g., noise, traffic, public utilities), a list of project methods was employed. For potential cumulative impacts that are more regional in scope (e.g., air quality, global warming, and cultural resources), planning documents were additionally used in the analysis.

List of Projects Considered for Cumulative Analysis

Cumulative projects are other projects in the vicinity of the project area (e.g., the same community plan or in the same general area) that could add to potential impacts above and beyond the project's individual or direct effect. A review of projects in close proximity to the project site revealed the following two projects which are considered relevant, pending cumulative projects in the study area.

- 1. 1398 Lieta Street: a residential development proposing 13 multi-family dwelling units on approximately 0.6 acre.
- 2. 3040 Clairemont Drive Apartments: a mixed used development proposing a retail/commercial building and 19 multi-family units on a 2.99-acre site near the intersection of Clairemont Drive and Burgener Boulevard.

The cumulative evaluation also considers the Draft Morena Corridor Specific Plan to a degree; however, since this is a planning document and not a specific development proposal, the potential impacts of its buildout are speculative at this time. As discussed in Section 7.6, a growth factor was used for evaluation of cumulative traffic impacts due to the small number of cumulative projects identified. The draft plan provides recommendations for the areas adjacent to the Mid-Coast trolley stations at Tecolote Road and Clairemont Drive within the Clairemont Mesa and Linda Vista community planning areas. The recommendations address the future form of development in light of the introduction of the Mid-Coast Light Rail Transit Trolley extension. In addition to land use and urban design recommendations, mobility improvements throughout the area have been identified for bicyclists, pedestrians, vehicles, and transit users. The draft plan has recently been out for public review.

Plans Considered for Cumulative Effects Analysis

This cumulative analysis relies on regional planning documents and associated CEQA documents to serve as an additional basis for the analysis of the broader, regional cumulative effects of the project, such as air quality and global climate change. The regional planning documents used in this analysis include the City of San Diego (City) General Plan, Clairemont Mesa Community Plan (CMCP), Draft Morena Corridor Specific Plan, San Diego Association of Governments' (SANDAG) San Diego Forward: The Regional Plan (Regional Plan), and San Diego Air Pollution Control District (SDAPCD) Regional Air Quality Standards (RAQS). These plans have been discussed throughout the Environmental Impact Report (EIR) and are incorporated by reference in the appropriate sections of the cumulative analysis below.

7.1 Land Use

Overall, projects that are consistent with the environmental goals, objectives, or recommendations of a General/Community Plan and would not result in impacts associated with requested deviations to existing regulatory requirements would have less than significant land use impacts. The project site is currently designated as Residential and Commercial Employment, Retail, & Services in the City General Plan Land Use Element, Land Use and Street System Map and the project site is subject to

the Mobile Home Park Overlay Zone within the CMCP. As detailed in Section 4.1, Land Use, while the project would require a General Plan Amendment, Community Plan Amendment, and a rezone, the proposed land use changes would not conflict with environmental goals, objectives, or recommendations of the General Plan or CMCP. Additionally, while the project is requesting deviations from selected development regulations, none of the proposed deviations would result in an adverse environmental impact.

The cumulative projects identified above would not result in significant land use consistency impacts, because all future projects that develop within the project area would be subject to City land use regulations, including the General Plan, CMCP, and Draft Morena Corridor Specific Plan (if adopted). Therefore, the project would not have a cumulatively considerable effect on land use. Cumulative impacts related to land use consistency would be less than significant.

7.2 Noise

Cumulative noise impacts could result from the project's construction-related noise combined with other construction activity within the project area. As discussed in Section 4.2.4.1(a), the project would result in significant construction noise impacts due to an increase in ambient noise levels during construction above allowable limits. Specifically, Table 4.2-5 shows that project construction would potentially generate noise levels up to 78 dB(A) at sensitive receptors surrounding the project, which would exceed the City's Municipal Code noise limit of 75 dB(A). Implementation of mitigation measure NOI-1 would reduce potential direct construction noise impacts to below a level of significance. This mitigation measure would require limitations on the simultaneous use of equipment, would implement requirements on the location and scheduling of noise generating equipment, require designation of a noise disturbance coordinator, and require construction of a temporary noise barrier as detailed in Section 4.2.4.3. The implementation of these project-level mitigation measures would ensure that the project's contribution to cumulative noise impacts would be less than significant.

Cumulative noise impacts could also result from increases in traffic volumes associated with the project when combined with other developing projects in the project area. No cumulative impacts associated with the cumulative projects in the project area were identified. The project itself would result in an increase in noise levels from traffic equivalent to 0.2 community noise equivalent level (CNEL), well below the threshold increase of 3.0 CNEL. Therefore, cumulative impacts related to the projects anticipated traffic-related noise would be less than significant.

7.3 Paleontological Resources

The City requires mitigation measures to address the potential for impacts to paleontological resources. These measures are applied to development projects within geologic formations that have a high and moderate potential for fossils throughout the City and include monitoring during grading, collection, and report preparation. All discretionary projects within the project area and the City would be reviewed to determine the likelihood of paleontological resources. Implementation of mitigation measures would also reduce the project's contribution to cumulative impacts to below a level of significance.

The project site is underlain by soils with a high potential for containing fossils. The site has been previously graded and a high sensitivity geologic formation is located less than 10 feet below the ground surface. Thus, although the project would only grade to a depth of 9 feet, grading would have the potential to impact Bay Point Formation, resulting in a significant impact. Grading in excess of 1,000 cubic yards of excavation would also occur. As discussed in Section 4.3, Paleontological Resources, the project would implement mitigation measure PALEO-1 which requires a monitor to be present during grading activities to ensure that if fossils are encountered, they are identified, documented and/or preserved. With implementation of the required mitigation measures, the project's contribution to cumulative impacts would be less than significant.

7.4 Cultural Resources

Historical and archaeological resources are non-renewable resources. Any direct impact would contribute to a cumulative loss of cultural resources. As addressed in Section 4.4, none of the buildings on-site would qualify as a historical resource. Likewise, no archaeological sites have been mapped on or adjacent to the project site. However, after consultation with Native American tribes (Assembly Bill [AB] 52 consultation process, see Section 7.5), it was requested that Native American monitors be present during project grading to ensure that any previously unknown subsurface cultural deposits, discovered during project grading and excavation, would be identified. Implementation of mitigation measure CUL-1 would reduce potential direct impacts to cultural resources to below a level of significance because an archaeological grading monitor would be present during grading activities should resources be encountered. If discovered, the mitigation measure ensures that steps are taken to determine the significance of the resource and identifies further mitigation measures to preserve and/or record the findings. The implementation of this mitigation measure would ensure that the project's direct impacts to cultural resources would be less than significant.

Through the reduction of potential direct impacts, the project would not have a cumulatively considerable effect on cultural resources. Additionally, all cumulative projects within the project area would also be required to mitigate for potential impacts to cultural resources consistent with the City's 2016 Significance Thresholds. Therefore, cumulative impacts to cultural resources would be less than significant.

7.5 Tribal Cultural Resources

Like cultural and historical resources, any direct impact to tribal cultural resources would contribute to a cumulative loss. Under AB 52, which established this new category of resources under CEQA, lead agencies are required to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. The project completed consultation consistent with the requirements of AB 52. Although there were no known tribal cultural resources on the project site, the project would be conditioned to implement mitigation measure CUL-1 which requires Native American monitoring during all grading and ground-disturbing activities. The implementation of this project-level mitigation measure would ensure that the project's contribution to potential cumulative tribal cultural resource impacts would be less than significant.

Other projects within the cumulative project area which involve grading would be conditioned in a similar manner to implement measures that would mitigate potential direct impacts which could result in a cumulative loss of important cultural resources.

7.6 Traffic Circulation

As stated in the Transportation Impact Analysis (TIA; see Appendix D of the EIR), "[C]umulative traffic impacts are those projected to occur at some point after a proposed development becomes operational, such as during subsequent phases of a project and when additional proposed developments in the area become operational (near-term cumulative) or when affected community plan area reaches full planned Year 2035 (long-term cumulative)." (see Appendix D, page 14). Because research to locate future projects in the study area produced limited results, growth factors were determined on a segment-by-segment basis for the intervening years between the existing condition and project opening day by comparing existing volumes with Year 2035 volumes, and deriving an average daily traffic (ADT) per year increase (approximately 1 percent per year on average throughout the study area). Peak hour intersection turning movement traffic volumes were determined based on this forecasted change in daily traffic volumes on each approach segment.

As described in Section 4.6.3, the project would result in the net generation of approximately 796 new ADT. The TIA analyzed cumulative impacts in Section 4.6.4.1(c).. According to the analyses, the project would have a cumulatively considerable impact on street segment operations along Morena Boulevard between Frankfort Street and Tecolote Road.

Under the Year 2035 Plus Project condition, two Morena Boulevard street segments (Segment #2 and Segment #4 shown in Table 4.6-9) would operate at LOS F, and one segment of Tecolote Road (Segment #6) would operate at LOS E. However, the volume to capacity (V/C) increase would be less than the allowable increase of 0.02 for Segment #4 and Segment #6, resulting in a less than significant impact for both of these segments. The V/C increase for Segment #2 (Morena Boulevard between Frankfort Street to Knoxville Street) would exceed the significance threshold for a segment operating at LOS F, resulting in a significant cumulative impact. Implementation of mitigation measure TRA-1 would reduce the cumulative road segment impact to Morena Boulevard between Frankfort Street to Knoxville Street (Segment #2) to less than significant. This mitigation measure would require the installation of an adaptive signal control system at three intersections on Morena Boulevard. The implementation of this project-level mitigation measure would ensure that the project's contribution to cumulative traffic impacts would be less than significant.

7.7 Visual Effects and Neighborhood Character

Implementation of the project would result in a change in the visual character of the project site. As discussed in Sections 4.7.3 and 4.7.4, the change would not be considered adverse or incompatible with surrounding uses. The project proposes a retaining wall exceeding 6 feet in height; however, it would not be visible to the public due to its being shielded from sight by the proposed buildings and landscaping. Overall, impacts associated with visual effects would have a less than significant contribution to a cumulative visual impact.

With respect to neighborhood character, the project would be consistent with and contribute to the character of the project area. All cumulative projects in the project area would be required to adhere to regulatory standards including height requirements, consistency of architectural styles, and restrictions on excessive bulk and design. Therefore, while development in the project area would result in intensification on a cumulative basis, the project's contribution to potential cumulative impacts would be less than significant.

7.8 Health and Safety/Hazardous Materials

As discussed in Section 4.8, Health and Safety/Hazardous Materials, the project would comply with all applicable state and local regulations, and would not impair implementation of the San Diego Emergency Plan. Additionally, wildland fire impacts would be less than significant because the project is not located within a Very High Fire Hazard Safety Area and would implement all City Fire Marshal's Standards. All cumulative projects in the project area would also be required to adhere to health and safety regulations and fire safety standards. Therefore, the project's contribution to cumulative health and safety/hazardous materials impacts would be less than significant.

7.9 Hydrology

The project would not substantially or adversely impact existing drainage patterns, increase runoff, or create flood hazards on-site or downstream. As discussed in Section 4.9, the project includes grading to raise the portion of the project site mapped within the 100-year floodplain. Upon completion of the project, a Letter of Map Revision/CLOMR-F would be issued by the Federal Emergency Management Agency to document that the project would be constructed on elevations outside of the 100-year floodplain. The standard engineering practices and best management practices (BMPs) of the project have been designed to preclude potential hydrology impacts, including those resulting from drainage into Tecolote Canyon. All cumulative projects in the project area would be similarly mandated to adhere to state and local engineering requirements and regulations. Therefore, the project would not contribute to any cumulative hydrologic effects within the project area.

7.10 Water Quality

The project would comply with all applicable federal, state, and local water quality standards through adherence to the City's Storm Water Standards. The project design incorporates features to reduce pollutant discharge off-site, including permanent structural and treatment BMPs (see Figure 4.10-2). Implementation of the proposed BMPs would reduce pollutant discharge to receiving waters and direct impacts would be less than significant. All cumulative projects in the project area would also be required to implement these mandated water quality protection measures, and adhere to the City's National Pollutant Discharge Elimination System permit, and Storm Water Standards. Therefore, the project would not contribute to any cumulative water quality impacts.

7.11 Geology and Soils

The project would follow standard construction practices and engineering codes, as well as sitespecific recommendations included in the Geotechnical Investigation, to ensure that direct geologic impacts associated with the project would be less than significant.

All cumulative projects in the project area would be required to implement recommended remedial measures identified in project-specific geotechnical investigations, which are required by the City's Grading Ordinance for all new development within the City. In addition, conformance to building construction standards for seismic safety as set out in the Uniform Building Code would ensure that new structures would be able to withstand seismic events within the City. Therefore, the project would not contribute to any cumulative impacts related to geology and soils.

7.12 Public Services

Implementation of the project would result in an incremental increase in demand for public services, including fire, police, parks, and libraries. The project would increase the residential population and thereby result in higher use of fire protection/emergency medical services, police protection, parks/recreational facilities, and libraries that serve the project area. All cumulative projects in the project area would also contribute to the demand of public services and facilities. However, like the project, all future projects would be required to pay Development Impact Fees prior to issuance of building permits that would support maintenance of fire and police protection services provided by the City. All projects would also be required to pay park fees to cover pro rata shares of park land and recreational facilities. With respect to schools, developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996 ensures that that project impacts to schools would be less than significant. Therefore, the project's contribution to cumulative impacts associated with fire protection/emergency medical services, police protection, parks/recreational facilities, libraries, and schools would be less than significant.

7.13 Utilities

7.13.1 Water Supply

Cumulative impacts associated with water supply could occur if the project resulted in excessive water use and water demand in combination with other cumulative projects that would exceed the planned water supply availability for the planning horizon, resulting in the need to construct new water facilities that could have significant impacts on the environment. As detailed in Section 4.13, the project would not result in excessive amounts of water and would implement water conservation measures in landscaping. Additionally, water demand assessments included in the 2105 City of San Diego and San Diego County Water Authority Urban Water Management Plan indicate that current and future water supplies would be adequate to serve the projected needs of the project, as well as regional water needs. Additionally, the City is pursuing additional ways to increase the reliability of local water supply options, and has established permanent water conservation requirements. As a result, existing and planned water supply is adequate to serve the

water demands of the cumulative project area. Cumulative impacts to water supply would be less significant.

7.13.2 Water Systems

Cumulative impacts associated with water systems could occur if water demand exceeds the capabilities of the distribution system. As detailed in Section 4.13, Utilities, the project proposes to connect a private on-site water system to the existing public water lines. The system would be constructed in accordance with the criteria established within the City's current water and sewer facility design guidelines, regulations, standards and practices. The system would be adequate to carry anticipated flows and no water system extensions would be required to serve the project. All cumulative projects in the project area would likewise be required to adhere to the City Water Department Facility Design Guidelines when designing water systems. Therefore, the project would not contribute to a significant cumulative impact related to water systems.

7.13.3 Wastewater Systems

The preliminary sewer study prepared for the project (see Appendix I) concluded that project-generated wastewater discharge would not exceed the hydraulic capacity of the existing 6-inch downstream pipe in Frankfort Street. All cumulative projects in the project area would likewise be required to demonstrate that adequate wastewater capacity can be provided. Therefore, the project would not contribute to a significant cumulative impact related to water systems.

7.13.4 Solid Waste

As discussed in Section 4.13, cumulative impacts to solid waste facilities would be significant if the project includes the construction, demolition, and/or renovation of 40,000 square feet or more of building space. All projects meeting this criterion would be required to prepare project-specific Waste Management Plan (WMP) to address waste generated during short-term project construction and long-term post-construction operation. As described in the WMP, the project's demolition, grading, and construction phases would achieve a total waste diversion rate of 96 percent. With respect to operational waste, the project would generate approximately 139 tons per year; however, compliance with the City's Recycling Ordinance and implementation of the measures outlined in the project's WMP would result in an anticipated diversion rate of 40 percent, or 83 tons of waste per year after diversion.

The measures identified in the WMP, when implemented, would ensure that potential impacts to solid waste management facilities, including landfills, materials recovery facilities and transfer stations, and services, including collection, would be below a level of significance. Similarly, all future projects would be required to comply with the City's Recycling Ordinance and be required to prepare WMPs to show waste diversion measures. Therefore, cumulative impacts associated with solid waste would be less than significant.

7.13.5 Natural Gas

Cumulative impacts to natural gas could occur if the demands of the project coupled with foreseeable projects in the project area exceeded the ability of San Diego Gas & Electric to serve. There are adequate natural gas facilities and multiple pipelines to serve the project area. Therefore, cumulative impacts to natural gas would be less than significant.

7.13.6 Communication Systems

There are a number of private communication system providers available to serve the project area. Cumulative impacts would be less than significant.

7.14 Air Quality

As a regional issue, the cumulative study area for air quality impacts encompasses the San Diego Air Basin (SDAB) as a whole. Therefore, the cumulative analysis addresses regional air quality plans and policies, such as the RAQS, as well as the project's contribution to a net increase of any criteria pollutant for which the SDAB is listed as nonattainment. The SDAB is non-attainment for the 8-hour federal and state ozone standards. Ozone is not emitted directly, but is a result of atmospheric activity on precursors, nitrogen oxide (NO_X) and reactive organic gases (ROG). Past development has contributed to this condition and future development forecasted for the region could generate increased pollutant emission levels from transportation and stationary sources, potentially resulting in significant cumulative air quality effects.

The RAQS are based on the population, vehicle trends, and land use plans developed in general plans and used by SANDAG in the development of the regional transportation plans and sustainable communities strategy. Although the project would increase existing density on the project site, it would generate lower emissions than under the commercial employment, retail, and services land uses designated for the southeastern parcel. Therefore, the project's incremental contribution to potential cumulative impacts associated with implementation of the RAQS would be less than significant.

As discussed in Section 4.14.5, the project's construction-related emissions would not exceed the applicable regional emissions thresholds designed to provide limits below which project emissions would not significantly change regional air quality (see EIR Table 4.4-3). Likewise, the project's operational emissions would also not exceed the applicable regional emissions thresholds (see EIR Table 4.14-4). Therefore, the project's incremental contribution to cumulative air quality impacts would be less than significant.

7.15 Greenhouse Gas Emissions

Global climate change is, by its nature, a cumulative issue. To address greenhouse gas (GHG) emissions and to create a method of evaluating a project's consistency with GHG reduction strategies, the City developed its Climate Action Plan (CAP) corresponding CAP Consistency Checklist.

A project's consistency with the CAP, that is the inclusion of specific measures as part of the proposed project design, would allow a finding of project consistency with the CAP and a less than significant impact associated with GHG emissions. As discussed in Sections 4.15.4 and 4.15.5, the project would be consistent with relevant plans and policies and the City CAP as detailed in the CAP Consistency Checklist. Through implementation of the City's CAP strategy and specifically through the project-specific GHG-related design measures, the project's contribution to cumulative GHG emissions would be less than significant.



Chapter 8.0 Effects Found Not to be Significant

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15128, this section briefly describes the environmental issue areas that were determined during preliminary project review not to be significant, and are therefore not discussed in detail in Chapter 4.0 of the EIR.

8.1 Agricultural Resources

The California Department of Conservation identifies the project site as urban and built-up land that does not contain prime agricultural soils or farmlands. The project site is not subject to, nor near, a Williamson Act contract parcel. Therefore, project development would have no effect on agricultural resources.

8.2 Biological Resources

The project site is already developed and vegetation is limited to ornamental plantings along the perimeter of the property. The project site does not contain any sensitive vegetation communities, riparian habitat, or wetlands and no sensitive species were observed on-site. Furthermore, the project site does not contain, nor is it adjacent to, any Multi-Habitat Preservation Act designated lands. Therefore, project development would have no effect on biological resources.

8.3 Mineral Resources

The City's General Plan does not identify the project site as an existing or former extraction site and is identified as Mineral Resource Zone 3 in the General Plan's generalized mineral land classification map (General Plan, Figure CE-6). Mineral Resource Zone 3 is defined as an area where the significance of mineral deposits cannot be determined from the available data. Furthermore, mineral resource extraction would be infeasible due to the project site's zoning and land use

designation, the relatively small property size, and location in an urbanized area surrounded by esidential, commercial, and retail uses, and in proximity to Interstate 5 and the Los Angeles-San Diego-San Luis Obispo rail corridor. Therefore, project development would have no effect on mineral resources.



Chapter 9.0 Project Alternatives

In order to fully evaluate the environmental effects of projects, the California Environmental Quality Act Guidelines (California Code of Regulations, Title 14, Section 15000, et seq.; CEQA Guidelines) mandates that alternatives to the project be analyzed. CEQA Guidelines Section 15126.6 requires a discussion of "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to "focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project," even if these alternatives would impede to some degree the attainment of the project objectives.

CEQA also requires the evaluation of a No Project Alternative. The discussion of the No Project Alternative may proceed along two lines:

- 1. If the project is a development proposal, the No Project Alternative is the circumstance under which the project does not proceed.
- 2. When the project is the revision of an existing land use or regulatory plan, the No Project Alternative is the continuation of the existing plan.

In the case of the project described in this EIR, both types of No Project Alternative would be evaluated. The first type is considered the No Project Alternative in this chapter and the second type is considered the Current Plan Alternative, as detailed below.

As discussed in Chapters 4.0 and 7.0, the project could result in significant, direct, and/or cumulative environmental impacts related to land use, noise, cultural resources, tribal cultural resources, paleontological resources, and traffic circulation. Mitigation measures have been identified that would reduce all direct and cumulative impacts to below a level of significance.

In developing the alternatives to be addressed in this section, consideration was given to their ability to meet the basic objectives of the project and eliminate or substantially reduce significant environmental impacts. As identified in Chapter 3.0, project objectives include the following:

- Provide housing to accommodate increasing growth in the region.
- Enhance the visual character of the site as viewed from Morena Boulevard.
- Provide development that is consistent with the City of Villages and Smart Growth principles.
- Develop the site consistent with the scale and character of development in the surrounding area and the Clairemont Mesa Community Plan (CMCP).

The alternatives identified in this section are intended to provide a reasonable range of alternatives that could further reduce or avoid significant environmental effects of the project. This section includes a discussion of those alternatives considered but rejected, as required pursuant to CEQA Guidelines Section 15126.6(c), and two No Project Alternatives as required pursuant to CEQA Guidelines Section 15126.6(e). An additional reduced project alternative is also discussed. Therefore, the choice of alternatives includes the following:

- Alternative 1: No Project (No Development) Alternative): This alternative is the circumstance under which no development would occur and the project site would remain as its existing use.
- Alternative 2: Current Plan Alternative: Because the project requires a Community Plan Amendment and Rezone, this alternative is the circumstance under which the project site would be developed consistent with the existing Community Plan and Zoning designations.
- Alternative 3: Relocated Community Open Space Alternative: This alternative is the scenario under which the project redesigns the interior layout of its component parts, placing the pool and community open space at the entrance of the project.

Each major issue area included in the impact analysis of this EIR has been given consideration in the alternatives analyses, and impacts are summarized in Table 9-1. The Relocated Community Open Space Alternative was selected to for its ability to reduce potentially significant impacts of the project related to land use and noise by redesigning the project layout so that the buildings would attenuate potential noise impacts. Other than No Project (No Development) Alternative, no alternative was included that would avoid significant impacts related to paleontological resources, cultural resources, or tribal cultural resources because any development of the site would require some level of site grading and leveling that would trigger the monitoring requirements for these resources. Only the No Project (No Development) Alternative would avoid these impacts. For these reasons, the City of San Diego (City) finds that the range of alternatives is adequate.

As required under CEQA Guidelines Section 15126.6 (e), the EIR must identify the environmentally superior alternative. Pursuant to the CEQA Guidelines, if the No Project Alternative is determined to be the most environmentally superior project, then another alternative among the alternatives evaluated must be identified as the environmentally superior project. Section 9.5 addresses the Environmentally Superior Alternative.

Table 9-1 Comparison of Project and Alternatives Impacts Summary					
Environmental Issue Area	Project	No Project (No Development) Alternative	Current Plan Alternative	Relocated Community Open Space Alternative	
Land Use	Significant and mitigated	Greater than the project	Same as the project	Less than the project	
Noise	Significant and mitigated	Less than the project	Same as the project	Same as the project	
Paleontological Resources	Significant and mitigated	Less than the project	Same as the project	Same as the project	
Cultural Resources	Significant and mitigated	Less than the project	Same as the project	Same as the project	
Tribal Cultural Resources	Significant and mitigated	Less than the project	Same as the project	Same as the project	
Traffic Circulation	Significant and mitigated	Less than the project	Greater than the project	Same as the project	
Visual Effects and Neighborhood Character	Less than significant	Greater than the project	Same as the project	Greater than the project	
Health and Safety/ Hazardous Materials	Less than significant	Less than the project	Same as the project	Same as the project	
Hydrology	Less than significant	Greater than the project	Same as the project	Same as the project	
Water Quality	Less than significant	Greater than the project	Same as the project	Same as the project	
Geology and Soils	Less than significant	Same as the project	Same as the project	Same as the project	
Public Services	Less than significant	Same as the project	Same as the project	Same as the project	
Utilities	Less than significant	Same as the project	Same as the project	Same as the project	
Air Quality	Less than significant	Less than the project	Greater than the project	Same as the project	
Greenhouse Gas Emissions	Less than significant	Less than the project	Greater than the project	Same as the project	

9.1 Alternatives Considered but Rejected

This section of the EIR is provided consistent with CEQA Guidelines, which state that the EIR need examine in detail only a reasonable range of alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project. Further, the EIR should identify any alternatives that were considered by the lead agency but were rejected and briefly explain the reasons underlying the lead agency's determination. Among factors used to eliminate alternatives from detailed consideration in the EIR is failure to meet most of the basic project objectives or inability to avoid significant environmental effects (CEQA Guidelines 15126.6(c)). Another consideration for excluding an alternative from further study includes similarity to other alternatives that are addressed in detail.

9.1.1 Driveway Access Location Alternative

The Driveway Access Location Alternative was considered by the City. Under this alternative, the project would be developed as currently proposed except the main project access driveway would be located on Morena Boulevard, just north of the Morena Boulevard and West Morena Boulevard intersection, with a secondary driveway access at the north end of Morena Boulevard consistent with the location of the second access driveway for the project. Locating the main project access along Morena Boulevard was rejected from further consideration due to the proximity of the driveway to the intersection and safety of ingress and egress. This alternative is not evaluated further because it was rejected for the reasons identified above, is very similar to the existing project, and would not reduce any of the project's significant environmental impacts.

9.1.2 Alternate Location Alternative

According to CEQA Guidelines Section 15126.6(f)(2)(A):

The key question and first step in (alternative location) analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

As analyzed in Chapter 4.0, the project would result in significant impacts related to land use, noise, cultural resources, tribal cultural resources, paleontological resources, and traffic circulation. Land use impacts are related to compliance with interior noise standards and other noise impacts are associated with construction and operational noise. Noise impacts related to transportation noise from the adjacent roadways could be reduced by an alternative site located further away from Morena Boulevard; however, this would not achieve the project objective of providing development consistent with the City of Villages and Smart Growth principles to the same extent as locating the project adjacent to transit. Operational noise impacts associated with air conditioning units would not be reduced by an alternative location. Cultural resources, tribal cultural resources, and paleontological resources impacts are related to potential discovery of archaeological remains and/or fossils during grading. An alternative location would not substantially reduce project impacts

because most project sites will require some degree of grading into undisturbed soils and bedrock and archaeological, Native American and paleontological monitoring during grading is a very common mitigation measure not unique to the project site. Traffic circulation impacts are related to the project's contribution of traffic to already failing segments of Morena Boulevard. While an alternative location could avoid these impacts, the project would likely need to be relocated outside of the community to avoid adding traffic to Morena Boulevard, which would not achieve the project purpose. Further, any redevelopment of the project site would likely result in significant impacts due to the existing failing condition; thus, the impact is not peculiar to the project. Therefore, an alternate location is not considered further.

9.2 No Project (No Development) Alternative

The following discussion of the No Project Alternative is based on the CEQA Guidelines Section 15126.6(e)(3)(B) which states:

If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the no project alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this no project consequence should be discussed. In certain instances, the no project alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve existing physical environment.

Further, according to CEQA Guidelines Section 15126.6(e)(3)(C):

After defining the no project alternative . . . the lead agency should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

The No Project (No Development) Alternative would be maintaining the site as its current use as a recreational vehicle (RV) park and would maintain the other existing structures and uses on the project site including two duplexes, two single-family residences, and outdoor storage of trucks and RVs. Implementation of this alternative would not meet any of the project objectives as identified in Section 3.2, as no development, and thus no change to the project site, would occur. A comparative analysis of the impacts associated with this alternative compared to the project follows.

9.2.1 Land Use

The No Project (No Development) Alternative would maintain the project site's existing use including the Coastal Trailer Villa RV park, which consists of 90 RV spaces and associated site amenities. The two duplexes, two single-family residences, and outdoor storage of trucks and RVs would also remain. The current use is consistent with the existing General Plan, Community Plan, and Zoning. The density of the RV park is consistent with future plans for the Morena Boulevard corridor, which would include the proposed Tecolote Trolley/light rail transit (LRT) station proposed under the Mid-Coast Corridor Transit Project Trolley Blue Line Extension. Maintenance of the project site under its existing use would not require any deviations to the City Land Development Code (LDC).

The project requires a General Plan Amendment and Community Plan Amendment to change the existing land use designation to Medium Density Residential and remove the Mobile Home Park Overlay Zone. The project would also require a Rezone to change the existing zoning designations for the project site. Additionally, the project requires multiple deviations from the LDC to address construction within the 100-year floodplain, and other proposed design elements. Notwithstanding the required amendments and deviations, the project is able to make all relevant findings to conclude that potentially significant impacts associated with land use compatibility would be less than significant. Therefore, both the No Project (No Development) Alternative and the project would be consistent with land use plans and impacts would be considered the same.

The City Noise Element provides noise standards for multi-family residential sites. The interior noise standard is 45 community noise equivalent level (CNEL) and the exterior noise standard is 60 CNEL, or conditionally acceptable to 75 CNEL when affected by traffic. Projects that exceed these standards would not be compatible with the Noise Element and a significant impact would result. Based on noise contours shown in the Noise Assessment prepared for the project (see Appendix B) it is likely that the existing conditions at the project site would exceed Noise Element standards at least within the southern portion of the project site (closest to the freeway). The project includes the construction of a 6-foot-high noise attenuation barrier around the recreation/pool area that would serve to reduce the exterior noise at this location in the built condition. The project also includes mitigation measure LU-1 which ensures that buildings would achieve a 45 CNEL interior noise level. Because the noise levels under the No Project (No Development) Alternative would remain in excess of noise standards, impacts associated with compatibility with the City Noise Element would be considered significant.

Overall, land use (noise compatibility) impacts would be greater under the No Project (No Development) Alternative when compared to the project.

9.2.2 **Noise**

No construction noise would occur under the No Project (No Development) Alternative. Construction activity associated with the project would potentially generate noise levels up to 78 A-weighted decibels [dB(A)] at sensitive receptors surrounding the project, which would exceed the City's Municipal Code noise limit of 75 dB(A). The project would be required to implement mitigation measure NOI-1, which would require measures to be implemented to reduce noise levels during construction activities to a less than significant level. Additionally, the project noise associated with

exterior mechanical equipment (air conditioning units) could result in impacts to nearby sensitive receptors. The project would be required to implement mitigation measure NOI-2, which requires that prior to building permits the project ensures that mechanical equipment is adequately sited and screened to reduce noise to a less than significant level. While implementation of these mitigation measures would reduce impacts associated with noise to less than significant, there would be no new noise sources from construction activity or outdoor mechanical equipment associated with the No Project (No Development) Alternative. Thus, noise impacts of the No Project Alternative would be considered less than the project.

9.2.3 Paleontological Resources

The project site is underlain by Pleistocene-aged Old Paralic Deposits (Bay Point Formation, Qbp), which has a high potential for containing fossils. In the absence of grading under the No Project (No Development) Alternative, there would be no potential to impact paleontological resources within any fossil-bearing formation on-site. Any unknown buried resources would remain buried.

The project proposes grading activities totaling cut of 10,500 cubic yards at a maximum depth of 9 feet. In addition to exceeding the City threshold for impacts to paleontological resources, the Geotechnical Investigation prepared for the project found that there would be a potential for impacts to sensitive paleontological resources at 4 feet below the surface (near Tonopah Street), where greater depths of grading is proposed. Therefore, the project includes mitigation measure PALEO-1, which requires a Paleontological Monitor to be present throughout construction. The monitor would be responsible for halting construction should potential resources be uncovered and to assist in the creation of a recovery plan. Implementation of this mitigation measure would ensure that impacts to paleontological resources would be less than significant.

Because there is the potential for impacts to occur under the project, although they would be substantially lessened through mitigation, impacts to paleontological resources under the No Project (No Development) Alternative would be considered less when compared to the project.

9.2.4 Cultural Resources

Under the No Project (No Development) Alternative, the project site would remain graded and developed with the existing RV park and residences. No additional development would occur; any unknown buried cultural resources would not be disturbed.

The project requires 10,500 cubic yards of cut at a maximum depth of 9 feet and 11,800 cubic yards of fill at a maximum depth of 7 feet. Although the site was previously disturbed and it is unlikely that cultural resources would be encountered during grading, consultation with Native American tribes (pursuant to Assembly Bill (AB) 52) resulted in the conclusion that project grading could result in the discovery of buried artifacts that could be destroyed during grading. Mitigation measure CUL-1 requires archaeological and Native American monitoring during ground disturbance. Implementation of this mitigation measure would ensure that impacts to cultural resources as a result of project implementation would be less than significant.

No impacts to cultural resources would occur under the No Project (No Development) Alternative. The project requires mitigation during construction which would reduce potentially significant impacts to less than significant. However, because there is the potential for impacts to occur under the project, although substantially lessened through mitigation, no impacts to cultural resources would occur under the No Project (No Development) Alternative and impacts would be less than the project.

9.2.5 Tribal Cultural Resources

Under the No Project (No Development) Alternative, the project site would remain in its existing condition. No additional development would occur; any unknown buried tribal cultural resources would not be disturbed.

The project would require additional grading and excavation. The City participated in Assembly Bill (AB) 52 consultation with local Native American tribes with tradition and cultural affiliation with the project site. Although the site is previously disturbed and it is unlikely that tribal cultural resources would be encountered during grading, mitigation measure CUL-1 requires archaeological and Native American monitoring during ground disturbance. Implementation of this mitigation measure would ensure that impacts to tribal cultural resources would be less than significant.

No impacts to tribal cultural resources would occur under the No Project (No Development) Alternative. The project requires mitigation during construction which would reduce potentially significant impacts to less than significant. Because there is the potential for impacts to occur, although they would be substantially lessened through mitigation, impacts to tribal cultural resources under the No Project (No Development) Alternative would be considered less when compared to the project.

9.2.6 Traffic Circulation

Existing traffic conditions would remain unchanged under the No Project (No Development) Alternative. As shown in Table 4.6-1, existing project area intersections all operate at level of service (LOS) D or better during the AM and PM peak hour periods. As shown in Table 4.6-2, all project area street segments operate at LOS D or better, except Morena Boulevard from Frankfort Street to Viola Street operates at LOS F in the existing condition. With no development, there would be no impact.

The traffic impacts of the project would be avoided under this alternative as there would be no new trips added to the surrounding roadways. Thus, traffic circulation impacts of this alternative would be reduced compared to the project.

9.2.7 Visual Effects and Neighborhood Character

Under the No Project (No Development) Alternative, the existing visual conditions of the project site would remain. The project site itself does not offer views of Mission Bay or the Pacific Ocean; however, Tonopah Avenue, located adjacent to the project site, does provide public access to these scenic resources. The current land use has a disorganized appearance and lacks a consistent overall

design theme. Although the existing land use does not conflict with the existing character of the surrounding neighborhood, it does not enhance the visual character due to the disorganized appearance with multiple land uses of varying ages and lack of updated landscaping and architecture.

The scenic views of Mission Bay and the Pacific Ocean would not change under the project. The project would result in a change in existing land use that would result in an updated, consistent land use theme across the project site that includes structures with a consistent architectural style and updated landscaping that would enhance the project frontage and provide an improvement to the character of the site. The proposed multi-family use would be consistent with and would enhance the existing neighborhood character.

Overall, the project would change the visual character of the project site due to its redevelopment of the existing RV park to a multi-family residential complex. The project would include design features that would enhance the character of the site by providing an updated development with the accompanying site improvements and landscaping consistent with City requirements. Impacts of the No Project (No Development) Alternative in terms of neighborhood character would be slightly greater than the project.

9.2.8 Health and Safety/Hazardous Materials

The evaluation of health and safety/hazardous materials impacts includes the potential risk of wildfire, on-site hazardous materials, and airport compatibility. Risk is very low under the No Project (No Development) Alternative for all three categories because the project site is developed with low buildings with limited on-site or adjacent vegetation. The Phase 1 environmental assessment of the project site found no evidence of any recognized environmental conditions, and although there were asbestos-containing materials (ACMs) identified within select structures, the No Project (No Development) Alternative proposes no demolition or other activity that would otherwise disturb such materials.

Under the project, development would be consistent with all relevant fire code regulations ensuring that impacts associated with wildland fire risks would be minimal. Because demolitions of buildings are proposed, ACMs could be released unless safety measures are implemented. The project would be required to handle all potential hazardous materials in accordance with California Occupational Safety and Health Administration (Cal-OSHA) requirements for employee safety and disposed of in accordance with state and county regulations. The application of relevant regulations would ensure impacts associated with hazardous materials would be less than significant. Additionally, because the project is within requisite height restrictions for projects within an Airport Influence Area (AIA) review area, safety hazard impacts associated with the project site's proximity to the San Diego International Airport would be less than significant.

Since the project site would remain in its existing condition, no impacts associated with health and safety risks or hazardous materials would occur under the No Project (No Development) Alternative. Although the project would be required to adhere to all regulations associated with the handling and disposal of hazardous materials, which would reduce the potential for risk of impacts; the

potential for impacts would still exist. Therefore, impacts under the No Project (No Development) Alternative would be considered less when compared to the project.

9.2.9 Hydrology

The project site would retain its current drainage patterns under the No Project (No Development) Alternative. The project site would continue to be within a mapped floodplain.

The project has been designed to utilize existing on-site drainage facilities and not substantially alter on- and off-site drainage patterns. Runoff volume and flow rates associated with project conditions would be slightly less than those of the current condition. Additionally, the project would decrease impervious areas by approximately 16 percent (one acre) compared to the existing condition and improve drainage due to new best management practices (BMPs). Under the project, the project site would be elevated by fill to ensure the proposed buildings are placed above required freeboard elevation per City and Federal Emergency Management Agency (FEMA) requirements.

On-site conditions would remain unchanged under the No Project (No Development) Alternative. The project would improve existing conditions, reduce impervious surfaces, and decrease runoff volumes. Therefore, impacts would be considered greater under the No Project (No Development) Alternative when compared to the project.

9.2.10 Water Quality

Under the No Project (No Development) Alternative, water quality conditions on the project site would not receive the benefits of the latest water quality regulations that would be implemented with the project improvements.

The project would implement BMPs to protect and improve water quality. In accordance with recent storm water quality regulations, the project would incorporate low-impact design, as well as source and structural BMPs, which would result in less than improved water quality protection measures on the project site compared to existing conditions and project water quality impacts would be less than significant.

On-site conditions would remain unchanged under the No Project (No Development) Alternative. Currently, there are no structural BMPs being utilized on-site that could eliminate or substantially reduce the pollutant load of on-site runoff. Under the project, BMPs would be incorporated as project features to reduce polluted storm water discharge. Therefore, impacts would be considered greater under the No Project (No Development) Alternative when compared to the project.

9.2.11 Geology and Soils

Geologic conditions at the project site would remain unchanged under the No Project (No Development) Alternative. According to the Geotechnical Investigation, the soils on-site may be subject to liquefaction, hydrocollapse, expansion, and compression; however, under this alternative, it is unlikely impacts would occur as no construction would take place. The project would construct new buildings and on-site amenities. The project would be designed and constructed to comply with

the City's Grading Regulation and implement recommended remedial measures identified in the Geotechnical Investigation, which would reduce the potential for geologic risks. The project would also stabilize the slope below Tonopah Avenue with landscaping. Overall, with implementation of Geotechnical Investigation recommendations and compliance with City Grading and Building Code requirements, project impacts related to geology and soils would be less than significant. Similarly, the project site does not have significant geologic concerns associated with the existing land use. Thus, impacts associated with geologic conditions under the No Project (No Development) Alternative would be similar to the project.

9.2.12 Public Services

The project site is currently adequately served by fire, police, parks, library, and school services. Although the project would increase the resident population within the project site, existing services would be adequate under the project. The project would pay applicable Development Impact Fees to cover maintenance of fire and police services. Additionally, there are adequate local parks and library facilities to cover City requirements for the project's proposed increase in residents on the project site. Overall, project impacts to public services and facilities would be less than significant.

Both the No Project (No Development) Alternative and the project would be covered by adequate public services and neither would result in a need for new or altered government services. Impacts would be considered the same.

9.2.13 Utilities

The project site is currently adequately served by water, sewer, solid waste removal, natural gas, and communication services. Although the project would increase the resident population within the project site, existing utilities would be adequate to service the project. The project would be required to adhere to the Waste Management Plan prepared for the project to ensure impacts to solid waste facilities resulting from operation of the project would be less than significant.

Both the No Project (No Development) Alternative and the project would be covered by adequate public utilities and neither would result in a need for new systems, or require substantial alterations to existing utilities. Impacts would be considered the same.

9.2.14 Air Quality

With respect to development projects, the primary sources of impacts to air quality are constructionand traffic-related emissions. Under the No Project (No Development) Alternative, no emissions related to construction would occur because there would be no improvements to the existing state of the project site. Additionally, no new traffic trips would be added to local roads. Therefore, there would be no changes to air emissions associated with the project site.

Construction activity associated with the project could result in increased air emission due to dust from grading and chemicals used during construction. However, as detailed in Table 4.14-3, total projected construction maximum daily emission levels for each criteria pollutant would not exceed

applicable regional emissions thresholds. With respect to operational emissions, Table 4.14-4 shows that the project would not result in exceeding any applicable regional emissions threshold.

No new air quality emissions would occur under the No Project (No Development) Alternative. The project would result in both construction and operational emissions, albeit not to a level considered significant. However, since the project would result in some additional emissions compared to the existing conditions, air emissions impacts under the No Project (No Development) Alternative would be considered less than when compared to the project.

9.2.15 Greenhouse Gas Emissions

Current sources of on-site greenhouse gas (GHG) emissions are associated with the vehicle use, energy use, water use, area sources (landscaping and other equipment use) and waste disposal practices of the existing land uses. Maintenance of the project site in its existing condition would eliminate short-term GHG emissions associated with grading and construction activities and long-term GHG emissions associated with mobile and area sources.

The project would be consistent with the City's adopted Climate Action Plan (CAP) as demonstrated in the completed a CAP Consistency Checklist (see Appendix K). The project incorporates project features to minimize GHG emissions. Overall, the project would increase GHG emissions due to construction and operational activities; however, incorporation of project design elements as detailed in the CAP Consistency Checklist would ensure project impacts related to greenhouse gas emissions are less than significant.

No new GHG emissions would occur under the No Project (No Development) Alternative. The project would result in GHG emissions associated with both construction and operational activities, albeit not to a level considered significant. However, since the project would result in some additional emissions compared to the existing conditions, GHG emission impacts under the No Project (No Development) Alternative would be considered less than the project.

9.2.16 Conclusions

Should the No Project (No Development) Alternative be implemented, the project's potentially significant impacts associated with cultural resources, noise, tribal cultural resources, and paleontological resources would not occur. While adoption of the No Project (No Development) Alternative would maintain the existing condition of the site, impacts associated with Noise Element compatibility (land use) and Neighborhood Character would be greater than the project.

9.3 Current Plan Alternative

The Current Plan Alternative is the circumstance under which the project site would be developed consistent with the existing General Plan and Zoning designations. As shown in Figure 4.1-1, the northern third of the project site is currently designated as Residential in the General Plan Land Use Element, Land Use and Street System Map, and the lower two-thirds is designated Commercial Employment, Retail & Services. With respect to existing zoning (see Figure 4.1-3), the western edge

of the project site is designated with a base zone of CC-4-2 (intended to accommodate development with high intensity), permitting a maximum density of 1 dwelling unit for each 1,500 square feet of lot area (San Diego Municipal Code [SDMC] Section 131.0507(a)(4)). The remainder of the project site is designated with a base zone of RS-1-7 (requiring minimum 5,000-square-foot lots). A conceptual plan representing development of the project site consistent with the existing designations is shown in Figure 9-1. As shown therein, the Current Plan Alternative would construct a total of 24 singlefamily lots (minimum of 5,000 square feet) located in the RS-1-7 zone. An additional 17,500 square feet of commercial and 15 multi-family apartments would be constructed within two 2-story buildings located in the CC-4-2 zone. This alternative would also include internal streets and parking to accommodate the residential and commercial uses. Implementation of the Current Plan Alternative would meet the project objectives as identified in Section 3.2, in that the Current Plan Alternative would result in the construction of housing to accommodate growth within the region, although housing would be provided to a lesser extent (111 fewer units). In addition, development under the Current Plan Alternative would be similar in scale to the project; however, development would all be focused immediately at the project frontage and would not provide the low scale transition area along the project frontage where the project has sited community open space. The bulk of buildings would be similar or greater than the project with the two-story, mixed-use structures located adjacent to the project frontage and not set back as with the project. At the rear of the site, the single-family residential area would be at a smaller scale when compared to the project. The Current Plan Alternative would include a landscaping plan in order to assist in visual consistency with the surrounding neighborhood. Therefore, the Current Plan Alternative would enhance the visual character of the site and would develop the site in a way that would be consistent within the scale and character of surrounding development. In addition, since the Current Plan Alternative would provide housing within the same location as the project, it would provide development that would be consistent with the City of Villages and Smart Growth principles.

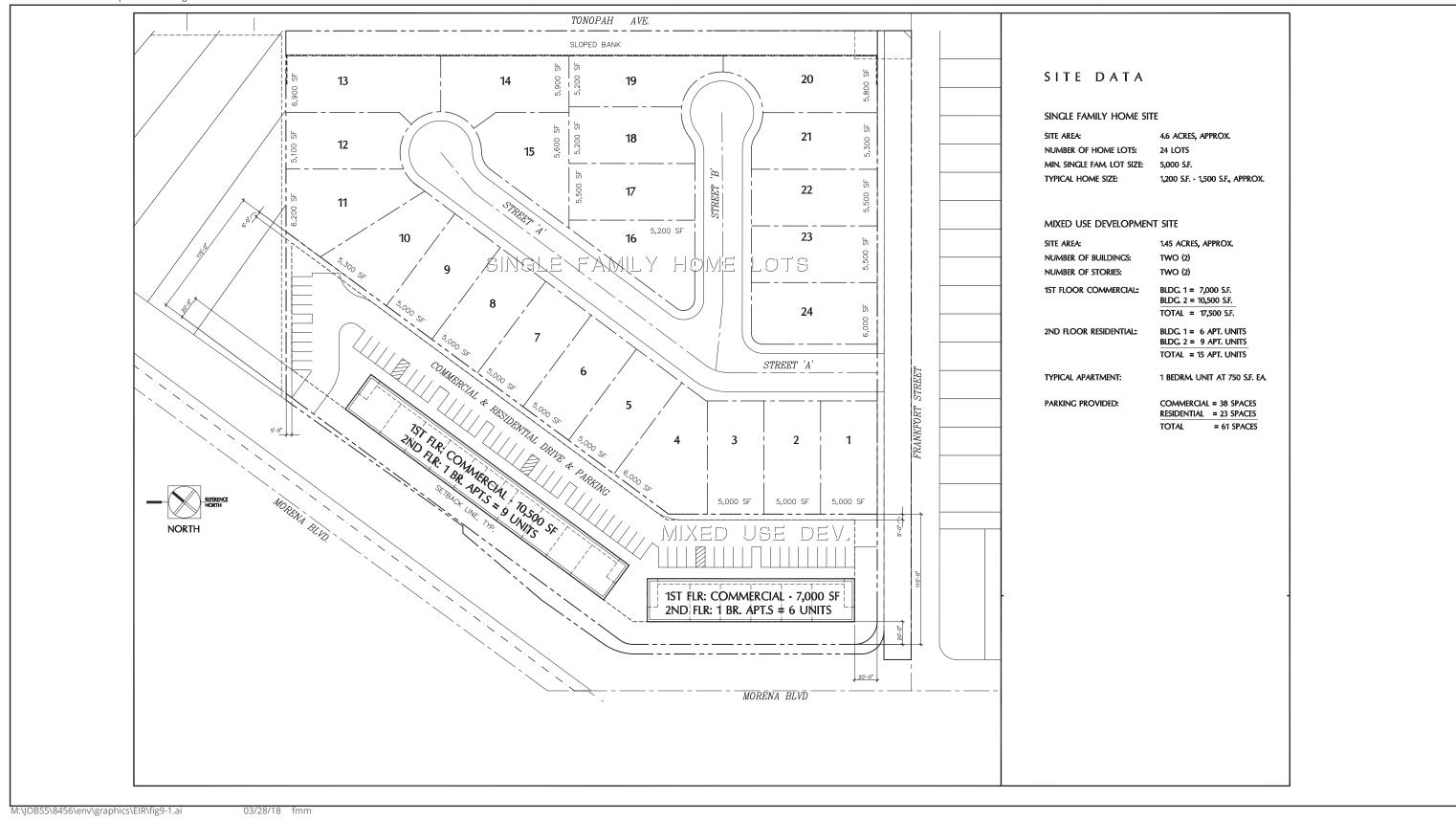
A comparative analysis of the impacts associated with the Current Plan Alternative and the project is provided below.

9.3.1 Land Use

The Current Plan Alterative would be consistent with existing General Plan and Zoning designations. Like the project, this alternative would construct multi-family units within FEMA Zone AO, which is designated as being within the 100-year floodplain. Deviations from the City's Environmentally Sensitive Land (ESL) regulations to allow construction within the floodplain would be required and a Letter of Map Revision/Conditional Letter of Map Revisions Based on Fill (LOMR/CLOMR-F) would be required by FEMA.

Although the project requires a General Plan Amendment, Community Plan Amendment, and Rezone to allow the proposed increase in density, both the Current Plan Alternative and the project would overall be consistent with the General Plan policy framework and impacts would be considered the same.

Impacts associated with consistency with the City's Noise Element would be the same as the project because noise attenuation measures would be required to reduce exterior noise within open space areas.



9.3.2 **Noise**

Like the project, the Current Plan Alternative could generate noise levels above allowable limits at sensitive receptors surrounding the project. As with the project, this alternative would be required to implement mitigation measures to ensure the reduction of impacts associated with construction noise. Also like the project, this alternative would include mechanical equipment (i.e., air conditioning units) which could produce significant noise especially during nighttime hours. Mitigation measures would be implemented to ensure that the siting and screening of such equipment would reduce potential impacts to less than significant levels. Overall, impacts associated with noise would be the same under this alternative when compared to the project.

9.3.3 Paleontological Resources

The development footprint would be the same under both the Current Plan Alternative and the project and would require additional grading beyond the existing condition. This could result in the potential for significant impacts to occur to undiscovered artifacts and paleontological resources. As with the project, this alternative would require paleontological monitoring during grading and excavation activities to reduce potential paleontological resource impacts to less than significant. Impacts to paleontological resources would be the same when compared to the project.

9.3.4 Cultural Resources

Like the project, the Current Plan Alternative would require additional grading beyond the existing condition resulting in the potential for significant impacts to occur to undiscovered cultural resources. As with the project, grading and excavation activities under this alternative would require mitigation measures to be implemented to ensure monitoring for cultural resources during activities. Impacts to cultural resources would be the same when compared to the project.

9.3.5 Tribal Cultural Resources

The development footprint would be the same under both the Current Plan Alternative and the project and would require additional grading beyond the existing condition. This could result in the potential for significant impacts to occur to undiscovered tribal cultural resources. As with the project, grading and excavation activities under this alternative would require mitigation measures to be implemented to ensure Native American monitoring for tribal cultural resources during grading activities. Impacts to tribal cultural resources would be the same when compared to the project.

9.3.6 Traffic Circulation

Based on the City of San Diego Traffic Impact Study Manual (1998) and the City's Trip Generation Manual (2003), the Current Plan Alternative would generate a gross total average daily traffic (ADT) of 1,036. This trip generation is calculated as follows:

- 216 ADT associated with 24 single-family detached residential units within an urbanized area (9 trips per dwelling unit)
- 700 ADT associated with 17,500 square feet of commercial (specialty retail center/strip commercial at 40 trips per 1,000 square feet
- 120 ADT associated with 15 multi-family apartments (multiple dwelling unit under 20 dwelling units/acre at 8 trips per dwelling unit).

As detailed in EIR Section 4.6, the project would generate a gross total of 900 ADT. Therefore, while this alternative is consistent with the adopted land use designation, and is accounted for in regional transportation plans, the amount of trips that could be generated by the project site with development allowed under the Current Plan Alternative would be greater than the project and thus, roadway segment impacts identified under the project would also occur and likely would be slightly greater. While this alternative could likely mitigate impacts to the same degree as the project, overall trip generation would be slightly greater. Thus, this alternative would result in incrementally greater traffic impacts when compared to the project.

9.3.7 Visual Effects and Neighborhood Character

Although the development footprint is the same, the scale of the Current Plan Alternative would be similar to the project. As viewed from Morena Boulevard, the bulk of buildings would be similar or greater than the project with the two-story, mixed-use structures located adjacent to the project frontage. At the rear of the site, the single-family residential area would be at a smaller scale when compared to the project. Additionally, buildings under this alternative would be more spread out when compared to the project due to the single-family residential area, and would be consistent with the surrounding neighborhood character. The project includes design measures such as landscaping and walls to assist in visual consistency with the surrounding neighborhood. Like the project, this alternative would not block any public view corridors or result in a blockage of a public resource from a public viewing area. Overall, visual impacts under this alternative would be considered the same when compared to the project.

9.3.8 Health and Safety/Hazardous Materials

Like the project, the Current Plan Alternative would not include uses that would involve hazardous materials and would be required to comply with all regulations associated with potential asbestos removal (for on-site structure demolition). Additionally, the alternative would not exceed allowable height limits set for the project site's location within the AIA Review Area 2. Impacts related to health and safety/hazardous materials under this alternative would be considered the same when compared to the project.

9.3.9 Hydrology

Although the density within the project site would be less than the project, the Current Plan Alternative would redevelop the entire site increasing impervious surfaces compared to the existing condition. Like the project, this alternative would be designed to include a storm drain system that

would direct all runoff into an on-site system designed to retain runoff to pre-development flows. This alternative would be required to comply with all regional and local regulations and requirements associated with hydrologic flow and reduction of polluted runoff. This alternative would also be required to remove the southern portion of the project site from the FEMA floodplain and process a LOMR-F with FEMA. Overall, hydrology related impacts would be considered the same when compared to the project.

9.3.10 Water Quality

The Current Plan Alternative would redevelop the project site and increase impervious surfaces. Although density would be less compared to the project, this alternative would increase the extent and intensity of existing development and could result in significant impacts to water quality. Like the project, this alternative would implement BMPs to protect and improve water quality in accordance with recent storm water quality regulations. This alternative would be required to incorporate low-impact design measures, as well as source and structural BMPs, which would lessen or altogether avoid water quality impacts. Water quality impacts under this alternative would be considered the same when compared to the project.

9.3.11 Geology and Soils

Geologic conditions on the project site would pose the same constraints on development under the Current Plan Alternative as with the project. Like the project, these constraints would be addressed through specific measures and design considerations contained in a Geotechnical Investigation and City ordinances to reduce impacts to below a level of significance. Geological impacts under this alternative would be considered the same when compared to the project.

9.3.12 Public Services

The on-site student population could increase under the Current Plan Alternative, and the demand for public services would increase correspondingly compared to the existing condition; however, it would be less than under the project. Also, because this project would generate less population (lower density) compared to the project, it would have slightly less demand on police, fire, parks, and libraries compared to the project. Like the project, this alternative would be required to pay Development Impact Fees to contribute to the ongoing need for police and fire services in the region and would not result in the construction of new facilities or the modification of existing facilities. Thus, impacts of this alternative would be similar to the project.

9.3.13 Utilities

Because the Current Plan Alternative would generate less population (lower density) compared to the project, it would have a slightly reduced demand on water, sewer, waste management, and electricity compared to the project. As with the project, an ongoing waste management program to manage waste disposal in order to meet state and local waste reduction goals would be implemented in order to ensure that the development meets or exceeds the City's requirements. Neither the project nor this alternative would require extension of utilities to serve the project as all

utilities are available and adequate to serve the project site. Impacts related to utilities under this alternative would be similar to the project.

9.3.14 Air Quality

The Current Plan Alternative would not conflict with the Regional Air Quality Standards because it would be consistent with the growth projections upon which the Regional Air Quality Standards is based. While construction-related emissions would be similar compared to the project, this alternative would result in slightly greater emissions of criteria pollutants due to the increased ADT associated with its buildout (see Section 9.3.6). Therefore, although emissions would be below allowable thresholds, this alternative is considered to result in incrementally greater air quality impacts when compared to the project.

9.3.15 Greenhouse Gas Emissions

Like the project, the Current Plan Alternative would be required to show compliance with the City's CAP and submit a CAP Consistency Checklist committing to regulatory reductions in GHG emissions including project design measures incorporating building and appliance standards. As with air quality, although this alternative is consistent with density used in development of the CAP, it would result in slightly greater emissions of GHGs due to the increased ADT compared to the project. Because this alternative would be consistent with all applicable goals and policies and aimed at reducing GHG emissions from land use and development, including the City's CAP, impacts associated with GHG emission would be less than significant. However, because of the increase in GHG emissions due to traffic generation, this alternative is considered to result in incrementally greater GHG impacts when compared to the project.

9.3.16 Conclusions

This alternative would increase the number of ADT due to the commercial component, resulting in incrementally greater impacts to traffic, air quality, and greenhouse gas emissions when compared to the project. All other issue areas would be the same. This alternative would not meet the project objectives focused on providing adequate housing to accommodate increasing growth in the region, and providing transit supportive development and connections to transit along the Morena Boulevard corridor.

9.4 Relocated Community Open Space Alternative

The Relocated Community Open Space Alternative would be similar to the project with the same number of multi-family residential units on the project site (150 units); however, the buildings would be oriented with the three-story multi-family structures and tuck under garages adjacent to Morena Boulevard and the community open space and pool areas located internal to the project site, closer to Frankfort Street as shown in Figure 9-2. All other project features would be the same as the project with similar main access points, parking, landscaping and open space. The Relocated Community Open Space Alternative would meet all project objectives as identified in Section 3.2; however, to a lesser extent than the project. The open space was sited in its location under the

proposed project at the request of community members to reduce the scale of the project at the frontage and enhance the visual character and consistency with the surrounding community. Thus, this alternative would achieve the second and fourth project objectives related visual and community character to a lesser extent. A comparative analysis of the impacts associated with the Relocated Community Open Space Alternative and the project is provided below.

9.4.1 Land Use

Like the project, the Relocated Community Open Space Alternative would not be consistent with existing land use and zoning designations. However, this alternative (like the project) would be consistent with all relevant General Plan and CMCP goals, objectives, and policies, as well as the General Plan City of Villages strategy regarding placement of higher density residential in proximity to existing transit. Like the project, this alternative would require similar deviations from the LDC including construction within a floodplain. Impacts associated with land use plan consistency would be the same.

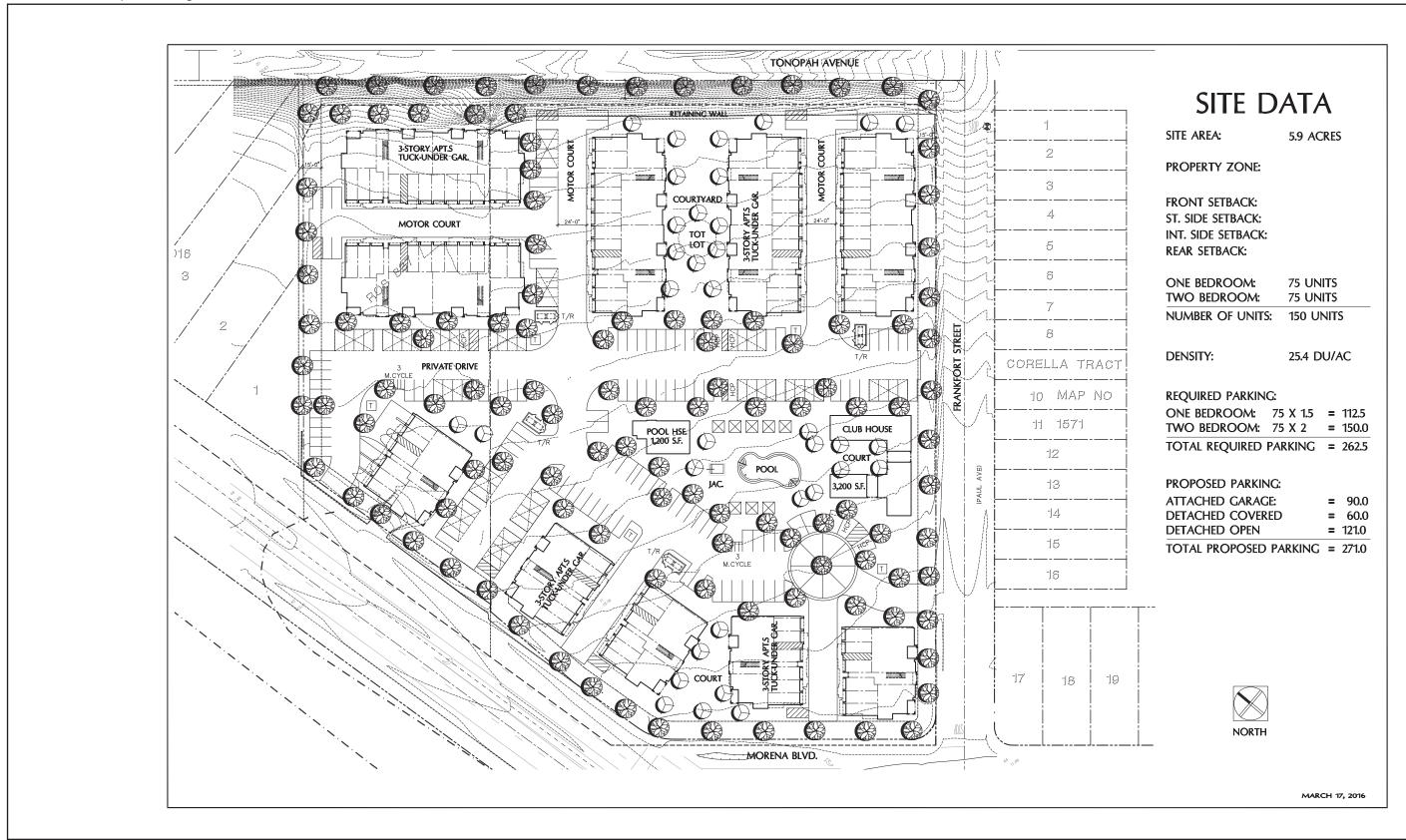
As shown in Figure 9-2, this alternative would place the pool and other community open space uses in areas outside the 75 CNEL noise contour. Therefore, this alternative would subject outdoor use areas at the pool to reduced noise levels compared to the project and would be more consistent with the City's Noise Element Compatibility Guidelines. Overall, because this alternative would be more consistent with exterior noise standards established in the Noise Element, land use impacts related to Noise Element compatibility would be slightly reduced when compared to the project.

9.4.2 **Noise**

Noise impacts under the Relocated Community Open Space Alternative would be similar to those of the project. Potentially significant impacts associated with construction and operation (air conditioning units) would be reduced to less than significant levels through implementation of mitigation measures. Therefore, noise impacts under this alternative would be the same when compared to the project.

9.4.3 Paleontological Resources

Construction of the Relocated Community Open Space Alternative would involve the same development footprint as the project and would require additional grading beyond the existing condition. This could result in the potential for significant impacts to undiscovered paleontological resources. As with the project, grading and excavation activities under this alternative would require a grading monitor to be on-site to ensure that resources are not affected during grading activities. Potentially significant impacts to paleontological resources under this alternative would be reduced to less than significant levels with the implementation of mitigation and considered the same when compared to the project.



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9.4.4 Cultural Resources

Construction of the Relocated Community Open Space Alternative would involve the same development footprint as the project and would require additional grading beyond the existing condition. This could result in the potential for significant impacts to occur to undiscovered cultural resources. As with the project, grading and excavation activities under this alternative would require the implementation of mitigation measures to ensure cultural resources are not affected during grading activities. Potentially significant impacts to cultural resources under this alternative would be reduced to less than significant levels with the implementation of mitigation and impacts would be the same when compared to the project.

9.4.5 Tribal Cultural Resources

Construction of the Relocated Community Open Space Alternative would involve the same development footprint as the project and would require additional grading beyond the existing condition. This could result in the potential for significant impacts to occur to undiscovered tribal cultural resources. As with the project, grading and excavation activities under this alternative would require the implementation of mitigation measures requiring a Native American monitor to be onsite during grading activities. This measure would ensure that tribal cultural resources are not affected during grading activities. Potentially significant impacts to tribal cultural resources under this alternative would be reduced to less than significant levels with the implementation of mitigation and considered the same when compared to the project.

9.4.6 Traffic Circulation

The Relocated Community Open Space Alternative would result in construction of the same number of residential units as the project and, therefore, generate the same amount of ADT. Like the project, significant impacts to failing segments of Morena Boulevard would be mitigated by the installation of adaptive signal control systems (mitigation measure TRA-1). Traffic-related Impacts under this alternative would be considered the same compared to the project.

9.4.7 Visual Effects and Neighborhood Character

The scale of the buildings for the Relocated Community Open Space Alternative would be similar to the project, which includes multiple deviations from the LDC, including retaining wall height. While this alternative would not block public vantage points or result in barriers to local views, the placement of the apartment buildings adjacent to the Morena Boulevard frontage would not provide as much variation and visual setback along the project frontage as is provided by the project. The project places the recreation area and clubhouse near the project frontage which reduces the visual bulk of structures as seen from surrounding roadways. The configuration of the project site under the Relocated Community Open Space Alternative was not preferred by the community. Both the project and the Relocated Community Open Space Alternative would provide frontage improvements and updated landscaping to enhance the project frontage. This alternative's impacts to community character would be similar to the project or slightly greater based on the community feedback received during the project design/planning process.

9.4.8 Health and Safety/Hazardous Materials

Like the project, the Relocated Community Open Space Alternative would not include uses that involve hazardous materials and would be required to comply with all regulations associated with potential asbestos removal (for on-site structure demolition). Additionally, this alternative would not exceed allowable height limits set for the project site's location within the AIA Review Area 2. Impacts related to health and safety/hazardous materials under this alternative would be the same when compared to the project.

9.4.9 Hydrology

Like the project, the Relocated Community Open Space Alternative would be designed to include a storm drain system that would direct all runoff into an on-site system designed to retain runoff to pre-development flows. This alternative would be required to comply with all regional and local regulations and requirements associated with hydrologic flow and reduction of polluted runoff. This alternative would also be required to remove the southern portion of the project site from the FEMA floodplain and process a LOMR-F with FEMA. Overall, hydrology-related impacts under this alternative would be the same when compared to the project.

9.4.10 Water Quality

The Relocated Community Open Space Alternative would redevelop the project site and increase impervious surfaces to the same degree as the project. Like the project, this alternative would implement BMPs to protect and improve water quality in accordance with recent storm water quality regulations. This alternative would be required to incorporate low-impact design measures, as well as source and structural BMPs, which would lessen or altogether avoid water quality impacts. Water quality impacts under this alternative would be the same when compared to the project.

9.4.11 Geology and Soils

Geologic conditions on the project site would pose the same constraints on development under the Relocated Community Open Space Alternative as with the project. Like the project, these constraints would be addressed through implementation of specific measures and design considerations contained in a Geotechnical Investigation and through compliance with City ordinances. Geological impacts under the Relocated Community Open Space Alternative would be the same when compared to the project.

9.4.12 Public Services

The number of units under the Relocated Community Open Space Alternative would be the same as the project, and the demand for public services would, therefore, be the same. As with the project, this alternative would not result in the construction of new facilities or the modification of existing facilities. Impacts would be the same compared to the project.

9.4.13 Utilities

The Relocated Community Open Space Alternative would result in the same demands on utilities as the project. As with the project, an ongoing waste management program would be implemented to manage waste disposal to meet regional and local waste reduction goals. Impacts to utilities under this alternative would be the same compared to the project.

9.4.14 Air Quality

The Relocated Community Open Space Alternative would require the same level of construction activity as the project, and as such would not generate emissions above the allowable threshold. Likewise, this alternative would result in the same ADT and, therefore, the same level of traffic-related emissions as the project. Therefore, air quality impacts under this alternative would be the same when compared to the project.

9.4.15 Greenhouse Gas Emissions

The Relocated Community Open Space Alternative would result in the same GHG emissions when compared to the project because it would require the same construction activities and generate the same number of ADT. Like the project, this alternative would be required to show compliance with the City's CAP and submit a CAP Consistency Checklist committing to regulatory reductions in GHG emissions including project design measures incorporating building and appliance standards. Like the project, this alternative would be consistent with all applicable goals and policies aimed at reducing GHG emissions, including the City's CAP; impacts associated with GHG emission would be considered the same when compared to the project.

9.4.16 Conclusions

This alternative would redesign the location of the pool and community open space within the project site. It would result in construction of the same number of residences and, therefore, the same density as proposed by the project. Land use compatibility impacts under this alternative would be less than the project because the community open space would be relocated outside of the 75 CNEL noise contour. However, placement of the three-story apartment buildings directly adjacent to Morena Boulevard would be less compatible with neighborhood character compared to the project. Community feedback received by the City resulted in the placement of the community uses closer to Morena Boulevard to provide a greater visual transition to the larger apartment structures.

9.5 Environmentally Superior Alternative

CEQA Guidelines (Section 15126.6(e)(2)) require that an environmentally superior alternative be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative which would result in the least adverse environmental impacts to the project site and surrounding area. Significant impacts associated with cultural resources, tribal

cultural resources, and paleontological resources would occur with any project that requires grading within the project site. Additionally, traffic circulation impacts would likely occur under most development scenarios including development of the site under the existing Community Plan and zoning due to the existing failing segments along Morena Boulevard. Impacts associated with construction noise and operational noise (air conditioning units) would likewise also occur with any major development project. The remaining significant impact associated with the project would be related to land use compatibility and consistency with the Noise Element. Any project proposed in this location would likely require implementation of construction measures to ensure interior noise levels would meet interior noise standards. However, compatibility with outdoor use area noise compatibility guidelines would be improved with the Relocated Open Space Alternative compared to the project because of the location of community open space outside of the 75 dB(A) noise contour and the location of intervening structures that would provide noise attenuation. Although the community preferred the project design of the project due to the placement of lower height structures near the project frontage, the Relocated Open Space Alternative would be considered the Environmentally Superior Alternative for its ability to reduce outdoor noise levels at the community open space.



Chapter 10.0 Mitigation Monitoring and Reporting Program

The California Environmental Quality Act (CEQA), Section 21081.6, requires that a mitigation monitoring and reporting program (MMRP) be adopted upon certification of an EIR to ensure that the mitigation measures are implemented. The MMRP specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.

The Environmental Impact Report (EIR) prepared for the Morena Apartment Homes project (project), incorporated herein as referenced, focused on issues determined to be potentially significant by the City. The issues addressed in the EIR include land use, traffic circulation, cultural resources, air quality, greenhouse gas emissions, noise, visual effects and neighborhood character, health and safety/hazardous materials, hydrology, water quality, geology and soils, public services, utilities, tribal cultural resources, and paleontological resources.

Public Resources Code Section 21081.6 requires monitoring of only those impacts identified as significant or potentially significant. After analysis, potentially significant impacts requiring mitigation were identified for land use (interior noise), noise (operational), cultural resources, tribal cultural resources, and paleontological resources. The environmental analysis concluded that the potentially significant impacts associated with these resource areas could be avoided or reduced through implementation of recommended mitigation measures.

The MMRP for the project is under the jurisdiction of the City of San Diego (City) and other agencies as specified in Table 10-1. The MMRP for the project addresses only the issue areas identified above as significant. The following is an overview of the MMRP to be completed for the project.

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

 Prior to the issuance of a Notice to Proceed for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction-related activity onsite, the DSD Director's Environmental Designee shall review and approve all CDs (plans,

- specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.
- 2. In addition, the Environmental Designee shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "ENVIRONMENTAL/MITIGATION REQUIREMENTS."
- 3. These notes must be shown within the first three sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

https://www.sandiego.gov/development-services/industry/information/standtemp#guidelines

- 4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
- 5. **SURETY AND COST RECOVERY** The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II Post Plan Check (After permit issuance/Prior to start of construction)

 PRE CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT: The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants: Archeologist, Native American Monitor, and Paleontologist.

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

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division 858-627-3200**
- b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360**
- 2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) #526167, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e.,

to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

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

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

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

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST				
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes		
General	Consultant Qualification Letters	Prior to Preconstruction Meeting		
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting		
Paleontology	Paleontology Reports	Paleontology Site Observation		
Archaeology	Archaeology Reports	Archaeology/Historic Site Observation		
Waste Management	Waste Management Reports	Waste Management Inspections		
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter		

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

All the mitigation measures identified in the EIR are stated herein and Table 10-1 summarizes the potentially significant project impacts and lists the associated mitigation measures and the monitoring efforts necessary to ensure that the measures are properly implemented.

LU-1: Interior Noise

Prior to issuance of a building permit, the project applicant shall provide evidence to the City to demonstrate that buildings will achieve a 45 CNEL interior noise level. Interior noise levels of the habitable residential spaces were calculated based on typical dimensions for similar projects of this type. The project could reach acceptable interior noise levels for all three zone based on use of the following window/door ratings:

- Zone A: Utilizing sound transmission class (STC) 40 glazing would result in interior noise levels ranging from 41-45 CNEL.
- Zone B: Utilizing STC 35 glazing would result in interior noise levels ranging from 41-45 CNEL.
- Zone C: Utilizing STC 30 glazing would result in interior noise levels ranging from 40-45 CNEL.
- Remaining Façades: No requirement by code but STC 30 glazing is recommended and would result in interior noise levels ≤45 CNEL.
- STC 30 glazing would be required at the recreation building in order to meet CALGreen interior noise standards at non-residential spaces.

NOI-1: Construction Noise

Adherence to the following measures would reduce construction noise levels at adjacent properties to acceptable levels.

- Site preparation and grading phases should be scheduled to limit the number of heavy construction machines operating simultaneously.
- Install a temporary construction noise barrier at the northern, southern, and eastern property lines of the project site in order to reduce the noise impacts to the residential uses. The barrier should block the line of sight from the noise source to the receiver and have no holes or gaps. The minimum density should be 2 lbs./sq. ft.
- Limit construction activity to the hours of 7:00 am to 7:00 pm.
- Schedule highest noise-generating activity and construction activity away from noisesensitive land uses.
- Equip internal combustion engine-driven equipment with original factory (or equivalent) intake and exhaust mufflers which are maintained in good condition.
- Prohibit and post signs prohibiting unnecessary idling of internal combustion engines.
- Locate all stationary noise-generating equipment such as air compressors and portable generators as far as practicable from noise-sensitive land uses.

Utilize "quiet" air compressors and other stationary equipment where feasible and available.
Designate a noise disturbance coordinator who would respond to neighborhood complaints
about construction noise by determining the cause of the noise complaints and require
implementation of reasonable measures to correct the problem. Conspicuously post a
telephone number for the disturbance coordinator at the construction site.

NOI-2: Mechanical Equipment Siting and Screening

Prior to approval of building permits, the applicant shall demonstrate on building plans that the residential split-system condensing units (air conditioning units) are located a minimum of 60 feet from the closest single family residential property line or shall provide acoustical screening between the unit and the property line.

CUL-1: Archaeological and Native American Monitoring

- I. Prior to Permit Issuance
 - A. Entitlements Plan Check
 - Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental Designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.
 - B. Letters of Qualification have been submitted to ADD
 - 1. The applicant shall submit a letter of verification to the Mitigation Monitoring and Coordination (MMC) office identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
 - 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
 - 3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.
- II. Prior to Start of Construction
 - A. Verification of Records Search
 - 1. The PI shall provide verification to MMC that a site specific records search (¼-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation

- letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
- 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
- 3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼-mile radius.

B. PI Shall Attend Precon Meetings

- 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified archaeologist and Native American monitor shall attend any grading/excavation related precon meetings to make comments and/or suggestions concerning the archaeological monitoring program with the CM and/or Grading Contractor.
 - a. If the PI is unable to attend the precon meeting, the applicant shall schedule a focused precon meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

- a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
- b. The AME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

- a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

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

B. Discovery Notification Process

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

C. Determination of Significance

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

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported offsite until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.3(e), the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) shall be undertaken:

A. Notification

- 1. Archaeological monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the monitor is not qualified as a PI. MMC will notify the appropriate senior planner in the Environmental Analysis Section of the Development Services Department to assist with the discovery notification process.
- 2. The PI shall notify the medical examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the medical examiner in consultation with the PI concerning the provenance of the remains.

- 2. The medical examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
- 3. If a field examination is not warranted, the medical examiner will determine with input from the PI, if the remains are or are not most likely to be of Native American origin.
- C. If human remains ARE determined to be Native American
 - 1. The medical examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the medical examiner can make this call.
 - 2. NAHC will immediately identify the person or persons determined to be the most likely descendent (MLD) and provide contact information.
 - 3. The MLD will contact the PI within 24 hours or sooner after the medical examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.3(e), the California Public Resources and Health & Safety Codes.
 - 4. The MLD will have 48 hours <u>after inspection of the site</u> to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
 - 5. Disposition of Native American human remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with Public Resources Code 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN,
 - c. In order to protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement on the site;
 - (3) Record a document with the County.
 - d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures, the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are NOT Native American

- 1. The PI shall contact the medical examiner and notify them of the historic era context of the burial.
- 2. The medical examiner will determine the appropriate course of action with the PI and City staff (Public Resources Code 5097.98).
- 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, Environmental Analysis Section, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

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

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

b. Discoveries

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

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV - Discovery of Human Remains shall be followed.

- d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night and/or weekend work becomes necessary during the course of construction:
 - 1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

- 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
 - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation
 - The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms—DPR 523A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's HRG, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
 - 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 - 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
 - 4. MMC shall provide written verification to the PI of the approved report.
 - 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

- 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged.
- 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

- 3. The cost for curation is the responsibility of the property owner.
- C. Curation of artifacts: Accession Agreement and Acceptance Verification
 - 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
 - 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
 - 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)

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

PALEO-1: Paleontological Monitoring

I. Prior to Permit Issuance

A. Entitlements Plan Check

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

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all

persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines.

- 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
- 3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

- 1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
- 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

- 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

- The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the PME.
- The PI may submit a detailed letter to MMC during construction requesting a
 modification to the monitoring program when a field condition such as trenching
 activities that do not encounter formational soils as previously assumed, and/or when
 unique/unusual fossils are encountered, which may reduce or increase the potential for
 resources to be present.
- 3. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

- 1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
- 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
- 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

- 1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is

- required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
- b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
- c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
- d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

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

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

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Section III - During Construction.

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

- B. If night work becomes necessary during the course of construction
 - 1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

V. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
 - a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with the San Diego Natural History Museum

The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

- 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
- 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
- 4. MMC shall provide written verification to the PI of the approved report.
- 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains

- 1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
- 2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal

material is identified as to species; and that specialty studies are completed, as appropriate

C. Curation of fossil remains: Deed of Gift and Acceptance Verification

- 1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
- 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)

- 1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
- 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

TRA-1: Installation of Adaptive Signal Control Systems

Prior to issuance of any building permit, the Owner/Permittee shall assure, by permit and bond, the installation of an adaptive signal control system at three intersections on Morena Boulevard, to the satisfaction of the City Engineer. The three intersections would include West Morena Boulevard, Knoxville Street, and Tecolote Road. Improvements shall include enhanced fiber-optic signal interconnects and communications, additional detection sensors and computer equipment at each intersection, and a remote link to the Traffic Management Center downtown as well as an advance flashing beacon, satisfactory to the City Engineer. A proposed implementation plan for installation of the adaptive signal control system shall be provided to the City of San Diego by the applicant as early as possible. All improvements shall be completed and accepted by the City Engineer prior to issuance of the certificate of occupancy.

	Table 10-1 Mitigation Monitoring and Reporting Program		
Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, an Reporting Responsibility
LAND USE			-
Noise Standards. As detailed in Land Use Section 4.1.9 of this EIR, the project would expose residents to future transportation noise levels in excess of standards established in the Noise Element of the General Plan for interior noise (45 CNEL).	 LU-1: Interior Noise Prior to issuance of a building permit, the project applicant shall provide evidence to the City to demonstrate that buildings will achieve a 45 CNEL interior noise level. Interior noise levels of the habitable residential spaces were calculated based on typical dimensions for similar projects of this type. The project could reach acceptable interior noise levels for all three zone based on use of the following window/door ratings: Zone A: Utilizing STC 40 glazing would result in interior noise levels ranging from 41-45 CNEL. Zone B: Utilizing STC 35 glazing would result in interior noise levels ranging from 41-45 CNEL. Zone C: Utilizing STC 30 glazing would result in interior noise levels ranging from 40-45 CNEL. Remaining Facades: No requirement by code but STC-30 glazing is recommended and would result in interior noise levels ≤45 CNEL. STC 30 glazing would be required at the recreation building in order to meet CALGreen interior noise standards at non-residential spaces. 	Prior to the issuance of any Building Permits.	City of San Diego
Noise	•	<u>l</u>	
Ambient Noise Levels - Construction Noise As detailed in the Noise Section 4.6.4.1a., construction activities would temporarily increase ambient noise levels in the project vicinity to levels that exceed the City's Municipal Code noise limit of 75 dB(A), resulting in a significant impact.	 NOI-1: Construction Noise Adherence to the following measures would reduce construction noise levels at adjacent properties to acceptable levels. Site preparation and grading phases should be scheduled to limit the number of heavy construction machines operating simultaneously. Install a temporary construction noise barrier at the northern, southern, and eastern property lines of the project site in order to reduce the noise impacts to the residential uses. The barrier should block the line of sight from the noise source to the receiver and have no holes or gaps. The minimum density should be 2 pounds per square foot. Limit construction activity to the hours of 7:00 a.m. to 7:00 p.m. Schedule highest noise-generating activity and construction activity away from noise-sensitive land uses. Equip internal combustion engine-driven equipment with original factory (or equivalent) intake and exhaust mufflers which are maintained in good condition. Prohibit and post signs prohibiting unnecessary idling of internal combustion engines. Locate all stationary noise-generating equipment such as air compressors and portable generators as far as practicable from noise-sensitive land uses. Utilize "quiet" air compressors and other stationary equipment where feasible and available. Designate a noise disturbance coordinator who would respond to neighborhood complaints about construction noise by determining the cause of the noise complaints and require implementation of reasonable measures to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site. 	Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/ Permits and Building Plans/ Permits, but prior to the first pre-construction meeting.	City of San Diego
Ambient Noise Levels - Operational Noise As detailed in the Noise Section 4.6.4.1c., operational noise associated with mechanical equipment would be significant due to nighttime noise level potentially in excess of the single family residential property line limit of 40 dB(A).	NOI-2: Mechanical Equipment Siting and Screening Prior to approval of building permits, the applicant shall demonstrate on building plans that the residential split-system condensing units (air conditioning units) are located a minimum of 60 feet from the closest single family residential property line or shall provide acoustical screening between the unit and the property line.	Prior to approval of Building Permits.	City of San Diego

	Table 10-1 Mitigation Monitoring and Poporting Program		
Potentially Significant Impact	Mitigation Monitoring and Reporting Program Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, ar Reporting Responsibility
PALEONTOLOGICAL RESOURCES	Willigation Measure	Timetraine of wildgactori	Кезропзівшсу
Paleontological Resources. As identified in the Paleontological Resources Section 4.15.3, implementation of the project has the potential to result in significant impacts to paleontological resources due to grading within sensitive geologic formations. Impacts would be significant.	PALEO-1: Paleontological Monitoring 1. Prior to Permit Issuance A. Entitlements Plan Check 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents. B. Letters of Qualification have been submitted to ADD 1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines. 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project. 3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program. II. Prior to Start of Construction A. Verification of Records Search 1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. B. PI Shall Attend Precon Meetings 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make		City of San Diego

	Table 10-1 Mitigation Monitoring and Reporting Program		
Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	2. Identify Areas to be Monitored Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).		
	 3. When Monitoring Will Occur a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur. b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present. 		
	 III. During Construction A. Monitor Shall be Present During Grading/Excavation/Trenching 1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the PME. 		
	 The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present. The monitor shall document field activity via the CSVR. The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC. 		
	 B. Discovery Notification Process 1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery. 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible. 		

	Table 10-1 Mitigation Monitoring and Reporting Program		
Detentially Cignificant Impact	Mitigation Massura	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting
Potentially Significant Impact	Mitigation Measure C. Data variantian of Circuitian as	Timeframe of Mitigation	Responsibility
	C. Determination of Significance1. The PI shall evaluate the significance of the resource.		
	 a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI. 		
	b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.		
	c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.		
	d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.		
	IV. Night and/or Weekend Work		
	A. If night and/or weekend work is included in the contract		
	 When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 		
	2. The following procedures shall be followed.		
	a. No Discoveries		
	In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the Consultant Site Visit Record (CSVR) and submit to MMC via fax by 8 a.m. on the next business day.		
	b. Discoveries		
	All discoveries shall be processed and documented using the existing procedures detailed in Section III - During Construction.		
	c. Potentially Significant Discoveries		
	If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.		
	d. The PI shall immediately contact MMC, or by 8 a.m. on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.		

	Table 10-1 Mitigation Monitoring and Reporting Program		
			Monitoring, Enforcement, and Reporting
Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Responsibility
	B. If night work becomes necessary during the course of construction		
	1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.		
	 The RE, or BI, as appropriate, shall notify MMC immediately. All other procedures described above shall apply, as appropriate. 		
	V. Post Construction		
	 A. Preparation and Submittal of Draft Monitoring Report 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring, 		
	a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.		
	b. Recording Sites with the San Diego Natural History Museum The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.		
	2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.		
	3. The PI shall submit revised Draft Monitoring Report to MMC for approval.		
	4. MMC shall provide written verification to the PI of the approved report.		
	5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.		
	B. Handling of Fossil Remains		
	 The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. 		
	C. Curation of fossil remains: Deed of Gift and Acceptance Verification		
	The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.		
	2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.		

	Table 10-1 Mitigation Monitoring and Reporting Program		
Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Fotentially Significant Impact	D. Final Monitoring Report(s)	Timetrarile of Willigation	Responsibility
	 The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved. 		
	2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.		
CULTURAL RESOURCES			
Prehistoric Resources. As detailed in the Cultural Resources Section 4.3.4, the entire project site is developed and has been subject to prior disturbance and placement of fill. However, the Native American tribes requested that Native American monitors be present during project grading. Therefore, archaeological and Native American monitoring has been incorporated as a mitigation measure in response to the request of the tribes.	 CUL-1: Archaeological and Native American Monitoring I. Prior to Permit Issuance A. Entitlements Plan Check 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process. B. Letters of Qualification have been submitted to ADD 1. The applicant shall submit a letter of verification to the Mitigation Monitoring and Coordination (MMC) office identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation. 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG. 3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program. 	Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first pre-construction meeting.	City of San Diego
	 II. Prior to Start of Construction A. Verification of Records Search 1. The PI shall provide verification to MMC that a site specific records search (¼-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery 		
	during trenching and/or grading activities. 3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼-mile radius.		

	Table 10-1 Mitigation Monitoring and Reporting Program		
Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Potentially Significant Impact	 B. PI Shall Attend Precon Meetings 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified archaeologist and Native American monitor shall attend any grading/excavation related precon meetings to make comments and/or suggestions concerning the archaeological monitoring program with the CM and/or Grading Contractor. a. If the PI is unable to attend the precon meeting, the applicant shall schedule a focused precon meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring. 2. Identify Areas to be Monitored a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the 	Timeframe of Mitigation	Responsibility
	 delineation of grading/excavation limits. b. The AME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation). 3. When Monitoring Will Occur a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur. b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present. 		

	Table 10-1 Mitigation Monitoring and Reporting Program		
Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	III. During Construction		
	 A. Monitor(s) Shall be Present During Grading/Excavation/Trenching 1. The archaeological monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The CM is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration (OSHA) safety requirements may 		
	necessitate modification of the AME. 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B–C and IV.A–D shall commence.		
	3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.		
	4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.		
	B. Discovery Notification Process		
	1. In the event of a discovery, the archaeological monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.		
	2. The monitor shall immediately notify the PI (unless monitor is the PI) of the discovery.		
	3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.		
	4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.		
	C. Determination of Significance		
	 The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If human remains are involved, follow protocol in Section IV below. 		

	Table 10-1 Mitigation Monitoring and Reporting Program		
Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
1 occiniony significante impace	a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.	Timename of imagacion	responsibility
	b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.		
	c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the final monitoring report. The letter shall also indicate that that no further work is required.		
	IV. Discovery of Human Remains		
	If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.3(e), the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) shall be undertaken:		
	A. Notification		
	 Archaeological monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the monitor is not qualified as a PI. MMC will notify the appropriate senior planner in the Environmental Analysis Section of the Development Services Department to assist with the discovery notification process. 		
	2. The PI shall notify the medical examiner after consultation with the RE, either in person or via telephone.		
	B. Isolate discovery site		
	1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the medical examiner in consultation with the PI concerning the provenance of the remains.		
	2. The medical examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.		
	3. If a field examination is not warranted, the medical examiner will determine with input from the PI, if the remains are or are not most likely to be of Native American origin.		

	Table 10-1 Mitigation Monitoring and Reporting Program			
Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility	
	C. If Human Remains ARE determined to be Native American			
	1. The medical examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the medical examiner can make this call.			
	2. NAHC will immediately identify the person or persons determined to be the most likely descendent (MLD) and provide contact information.			
	3. The MLD will contact the PI within 24 hours or sooner after the medical examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.3(e), the California Public Resources and Health & Safety Codes.			
	4. The MLD will have 48 hours <u>after inspection of the site</u> to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.			
	5. Disposition of Native American human remains will be determined between the MLD and the PI, and, if:			
	a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR			
	b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with Public Resources Code 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN,			
	c. In order to protect these sites, the landowner shall do one or more of the following:			
	(1) Record the site with the NAHC;			
	(2) Record an open space or conservation easement on the site;			
	(3) Record a document with the County.			
	d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures, the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above			
	D. If Human Remains are NOT Native American			
	1. The PI shall contact the medical examiner and notify them of the historic era context of the burial.			
	2. The medical examiner will determine the appropriate course of action with the PI and City staff (Public Resources Code 5097.98).			
	3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, Environmental Analysis Section, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.			

	Table 10-1 Mitigation Monitoring and Reporting Program		
Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
r oterically significant impact	V. Night and/or Weekend Work	Timename of Willigation	responsibility
	A. If night and/or weekend work is included in the contract		
	1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.		
	2. The following procedures shall be followed.		
	a. No Discoveries		
	In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 a.m. of the next business day.		
	b. Discoveries		
	All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV - Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.		
	c. Potentially Significant Discoveries		
	If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV – Discovery of Human Remains shall be followed.		
	d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.		
	B. If night and/or weekend work becomes necessary during the course of construction:		
	1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.		
	2. The RE, or BI, as appropriate, shall notify MMC immediately.		
	C. All other procedures described above shall apply, as appropriate.		
	VI. Post Construction		
	A. Preparation and Submittal of Draft Monitoring Report		
	1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.		

Table 10-1 Mitigation Monitoring and Reporting Program				
Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility	
	 a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report. b. Recording Sites with State of California Department of Parks and Recreation The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms—DPR 523A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's HRG, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report. 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to the MC for approval. 4. MMC shall provide written verification to the PI of the approved report. 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. 8. Handling of Artifacts 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged 2. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. 3. The cost for curation is the responsibility of the property owner. c. Curation of artifacts: Accession Agreement and Acceptance Verification 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American repores			

Table 10-1 Mitigation Monitoring and Reporting Program					
Potentially Significant Impact TRIBAL CULTURAL RESOURCES	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility		
Tribal Cultural Resources. As detailed in the Tribal Cultural Resources Section 4.14.4, implementation of the project has the potential to result in grading activities that could uncover and destroy subsurface cultural deposits, thereby resulting in a significant impact to tribal cultural resources.	Implementation of mitigation measure CUL-1: Archaeological and Native American Monitoring , detailed above would reduce impacts to less than significant.	Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first pre-construction meeting.	City of San Diego		
TRAFFIC CIRCULATION					
Traffic Circulation. As identified in the Traffic Circulation Section 4.6, implementation of the project has the potential to result in significant direct and cumulative impacts to street segment operations along Morena Boulevard between Frankfort Street and Tecolote Road. Impacts would be significant.	TRA-1: Installation of Adaptive Signal Control Systems Prior to issuance of any building permit, the Owner/Permittee shall assure, by permit and bond, the installation of an adaptive signal control system at three intersections on Morena Boulevard, to the satisfaction of the City Engineer. The three intersections would include West Morena Boulevard, Knoxville Street, and Tecolote Road. Improvements shall include enhanced fiber-optic signal interconnects and communications, additional detection sensors and computer equipment at each intersection, and a remote link to the Traffic Management Center downtown, satisfactory to the City Engineer. A proposed implementation plan for installation of the adaptive signal control system shall be provided to the City of San Diego by the applicant as early as possible. All improvements shall be completed and accepted by the City Engineer prior to first occupancy.	Assurances provided prior to issuance of any building permit and improvements completed prior to first occupancy.	City of San Diego		



Chapter 11.0 References Cited

California Air Resources Board (CARB)

- 2004 Revision to the California State Implementation Plan for Carbon Monoxide Updated Maintenance Plan for Ten Federal Planning Areas.
- 2007 California Greenhouse Gas Inventory Summary by Economic Sector. Last updated November 19. Accessed April 2014.
- 2008 Climate Change Scoping Plan: A Framework for Change. http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. December.
- 2016a Greenhouse Gas Inventory Data—2000 to 2014. http://www.arb.ca.gov/cc/inventory/data/data.htm (last updated March 30).
- 2016b California Air Quality Data Statistics. California Air Resources Board Internet Site. http://www.arb.ca.gov/adam/welcome.html. Top 4 Summary and Hourly Listing. Accessed November 30, 2016.
- 2016c Ambient Air Quality Standards. California Air Resources Board. May 4.
- 2017a The 2017 Climate Change Scoping Plan Update, The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target. January 20.
- 2017b Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets. June 2017.

California Energy Commission (CEC)

2013 Impact Analysis California's 2013 Building Energy Efficiency Standards. July.

2015 2016 Building Energy Efficiency Standards – Adoption Hearing. http://www.energy.ca.gov/title24/2016standards/rulemaking/documents/. Accessed June 10, 2015.

Carrico, Richard L.

1987 *Strangers in a Stolen Land. American Indians in San Diego 1850-1880.* Sierra Oaks Publishing, Newcastle, California.

Cline, Lora L.

1984 *Just Before Sunset.* J and L Enterprises, Jacumba, California.

Cook, Sherburne F.

1976 The Population of California Indians, 1769-1970. Berkeley: University of California Press.

Deméré, Thomas, and Stephen Walsh

1994 County of San Diego Paleontological Resources.

Federal Transit Authority (FTA)

Transit Noise and Vibration Impact Assessment.

https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.

pdf. Accessed July 12, 2017.

Gifford, Edward W.

- 1931 The Kamia of Imperial Valley. *Bulletin of the Bureau of American Ethnology* 97:1-94. Smithsonian Institution, Washington, D.C.
- 1973 Miwok Lineages and the Political Unit in Aboriginal California. In *The California Indians*, edited by R. F. Heizer and W. A. Whipple. University of California Press, Berkeley.

Hector, Susan M., and Stephen R. Van Wormer

1986 Broken Fragments of Past Lifeways: Archaeological Excavations at Los Peñasquitos Ranch House, Volumes I and II. RECON.

Intergovernmental Panel on Climate Change (IPCC)

2014 Fifth Assessment Report (AR5), Climate Change 2014: Synthesis Report.

LGC Valley, Inc.

2016 Response to City of San Diego LDR-Geology Cycle Issues/Review Comments Proposed Apartment Complex Development, 1579 and 1623 Morena Boulevard, City of San Diego, California. August 28, 2017.

Luomala, Katherine

1978 Tipai-Ipai. In *California*, edited by Robert F. Heizer, pp. 592-609. Handbook of North American Indians, vol. 8, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

May, R. V.

- 1975 A Brief Survey of Kumeyaay Ethnography. *Pacific Coast Archaeological Society Quarterly* 11(4):1-25.
- 1976 An Early Ceramic Date Threshold in Southern California. *Masterkey* 50(3):103-107.
- 1978 A Southern California Indigenous Ceramic Typology: A Contribution to Malcolm J. Rogers Research. *ASA Journal* 2:2.

Meighan, Clement W.

1954 A Late Complex in Southern California Prehistory. *Southwestern Journal of Anthropology* 10:215-227.

Pourade, Richard

1960 The Explorers. Copley Press, reproduced by San Diego Historical Society. https://sandiegohistory.org/wp-content/uploads/migrated/books/pourade/explorers/explorers.pdf. Accessed August 13, 2017.

San Diego Air Pollution Control District (SDAPCD)

- 2012 Redesignation Request and Maintenance Plan for the 1997 National Ozone Standard for San Diego County.
- 2013 Air Quality in San Diego County. 2013 Annual Report.

San Diego Association of Governments (SANDAG)

- 2002 (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region. April.
- 2015 San Diego Forward: The Regional Plan (Regional Plan). October.
- 2016a Smart Growth Concept Map Website. http://www.sandag.org/index.asp?projectid=296&fuseaction=projects.detail. Accessed July 29, 2017.
- 2016b Data Surfer Website. http://datasurfer.sandag.org/. Accessed July 29, 2017.
- 2017 Mid-Coast Corridor Transit Project Fact Sheet. Available from the SANDAG website at http://www.sandag.org/uploads/publicationid/publicationid_12_19516.pdf. Accessed February.

San Diego, City of

2005 Environmental Impact Report Guidelines. Updated December.

- Seismic Safety Study maps http://archive.sandiego.gov/development-services/industry/hazards/pdf/seismicstudy.pdf. Accessed August 12, 2017.
- 2015 Climate Action Plan. Adopted December.
- 2016a Significance Determination Thresholds. California Environmental Quality Act. Development Services Department. July.
- 2016b 2015 San Diego Urban Water Management Plan. https://www.sandiego.gov/sites/default/files/2015_uwmp_report.pdf. Accessed August 20, 2017.

San Diego County Regional Airport Authority (SDCRAA)

2014 Airport Land Use Compatibility Plan for the San Diego International Airport, San Diego, California. Amended May 1.

San Diego County Water Authority (SDCWA)

2015 Urban Water Management Plan. http://www.sdcwa.org/sites/default/files/UWMP2015.pdf. Accessed August 20, 2017.

Shipek, Florence, ed.

1982 Kumeyaay Socio-Political Structure. *Journal of California and Great Basin Anthropology* 4(2):96-303.

Spier, Leslie

1923 Southern Diegueno Customs. *University of California Publications in American Archaeology and Ethnology*, Vol.20, No. 16.

U.S. Energy Information Administration

2017 Natural Gas Consumption by End Use. Available at https://www.eia.gov/dnav/ng/NG_CONS_SUM_DCU_SCA_A.htm. Accessed June 24, 2017

U.S. Environmental Protection Agency (EPA)

- 2010 *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2008.* U.S. Greenhouse Gas Inventory Program, Office of Atmospheric Programs. 430-R-10-006. April 15.
- 2013 Energy Star. http://www.energystar.gov Accessed July 2.
- 2014 U.S. EPA State and Local Climate and Energy Program. http://www.epa.gov/statelocalclimate/index.html. Accessed January 23.
- 2016 Criteria Air Pollutants, Particulate Matter. https://www3.epa.gov/airquality/particlepollution/index.html. Last updated February 23.



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Chapter 13.0 Certification

This document has been completed by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department Deputy Director and is based on independent analysis and determinations made pursuant to the San Diego Land Development Code Section 128.0103.

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