



THE CITY OF SAN DIEGO

MITIGATED NEGATIVE DECLARATION

Project No. 503701
SCH No. 2018021004

SUBJECT: Liaghat Hillside Vacation- COASTAL DEVELOPMENT PERMIT (CDP), SITE DEVELOPMENT PERMIT (SDP), BOUNDARY LINE ADJUSTMENT (BLA) and a SEWER EASEMENT VACATION for a sewer easement vacation to allow the construction of a 7,884 square foot two story residence. The square footage includes a 3,600 upper floor, a 3,949 square foot second floor, a 790 square foot garage and 730 square feet of decks. The decks and basement are not included in the overall 7,884 square feet. The project is situated on a vacant .514 acre lot on the west side of Hillside Drive. Due to an encroachment into the Multi-Habitat Planning Area (MHPA) a Boundary Line Adjustment (BLA) is required. The proposed project is located within: Base zone RS-1-1, Coastal Height Limitation Zone, Coastal Overlay Zone (Non-Appealable 1), Brush Management Area, Parking Impact Overlay Zone (Coastal), the City's Historical Sensitivity map, and the La Jolla Community Plan. **(LEGAL DESCRIPTION: LOT 17 OF MUIRLANDS RIVIERA IN THE CITY OF SAN DIEGO, COUTNY OF SAN DIEGO, STATE OF CALIFORNIA, ACCORDING TO MAP THERE OF NO. 3894, FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAID SAN DIEGO COUNTY)**

Update 5/4/2018

Revisions to this document have been made when compared to the Draft Mitigated Negative Declaration (DMND) dated February 2, 2018. A table was added to Section X of the Initial Studies that clarifies the results of the Functional Equivalency Analysis for the MHPA Boundary Line Adjustment. The modifications to the FMND are denoted by strikeout and underline format. In accordance with the California Environmental Quality Act, Section 15073.5 (c)(4), the addition of new information that clarifies, amplifies, or makes insignificant modification does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated when there is identification of new significant environmental impact or the addition of a new mitigation measure required to avoid a significant environmental impact. The addition of the Functional Equivalency Analysis Table within the environmental document does not affect the environmental analysis or conclusions of the MND.

- I. PROJECT DESCRIPTION: See attached Initial Study.
- II. ENVIRONMENTAL SETTING: See attached Initial Study.
- III. DETERMINATION:

The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental effect in the following areas(s): **Biological Resources**. Subsequent revisions in the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration. The project as revised now avoids or mitigates the potentially significant environmental effects previously identified, and the preparation of an Environmental Impact Report will not be required.

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

IV. MITIGATION, MONITORING AND REPORTING PROGRAM:

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

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.

2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, **"ENVIRONMENTAL/MITIGATION REQUIREMENTS."**

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

<http://www.sandiego.gov/development-services/industry/standtemp.shtml>

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II
Post Plan Check (After permit issuance/Prior to start of construction)

1. PRE CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT. The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants:

Biological Monitor

Note:

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

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858-627-3200**
- b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360**

2. MMRP COMPLIANCE: This Project, Project Tracking System (PTS) #503701 and /or Environmental Document #503701, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc

Note:

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

3. OTHER AGENCY REQUIREMENTS: Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency.

Not Applicable

4. MONITORING EXHIBITS

All consultants are required to submit , to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of 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 Preconstruction Meeting
Biological Resources	Monitoring Report(s)	Biological Observation
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

B. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

BIO-1 DIRECT HABITAT MITIGATION REQUIREMENTS

Payment for 0.308 acre to the City's Habitat Acquisition Fund is required as follows:
1:1 mitigation ratio for 0.308 acre of Tier II impact outside MHPA with mitigation within the MHPA.

BIO-2 BIOLOGICAL RESOURCE PROTECTION DURING CONSTRUCTION

I. Prior to Construction

- A. **Biologist Verification** -The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. **Preconstruction Meeting** - The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

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

II. During Construction

- A. **Monitoring**- All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV). The CSV shall be e-mailed to MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. **Subsequent Resource Identification** - The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during

access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

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

VI. PUBLIC REVIEW DISTRIBUTION:

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

UNITED STATES GOVERNMENT
U.S. Fish and Wildlife Service (23)

STATE OF CALIFORNIA
California State Clearinghouse (46)
California Department of Fish and Wildlife (32A)

CITY OF SAN DIEGO
Development Project Manager: Glenn Gargas
Mayor's Office
Councilman Barbra Bry, Councilmember District 1
EAS – Jeff Szymanski
LDR Planning – Phil Lizzi
LDR Engineering – Karen Vera
LDR Landscaping – Vanessa Kohakura
LDR Geology - Patrick Thomas
Map Check-Michael Bowcutt
MSCP- Holly Smit-Kicklighter
Water Review (86A)
San Diego Central Library (81A)
La Jolla/Riford Branch Library (81L)
Historical Resources Board (87)

OTHER ORGANIZATIONS AND INTERESTED PARTIES


La Jolla Town Council (273)
La Jolla Community Planning Association (275)
Sierra Club (165A)
San Diego Audubon Society (167)
Jim Pugh (167A)
California Native Plant Society (170)
Endangered Habitat League (182)
South Coastal Information Center @ San Diego State University (210)
Frank Brown (216)
Carmen Lucas (206)

Clint Linton (215b)
San Diego Archaeological Center (212)
Save Our Heritage Organization (214)
Ron Christman (215)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society (218)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution (225 A-S)

VII. RESULTS OF PUBLIC REVIEW:

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

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



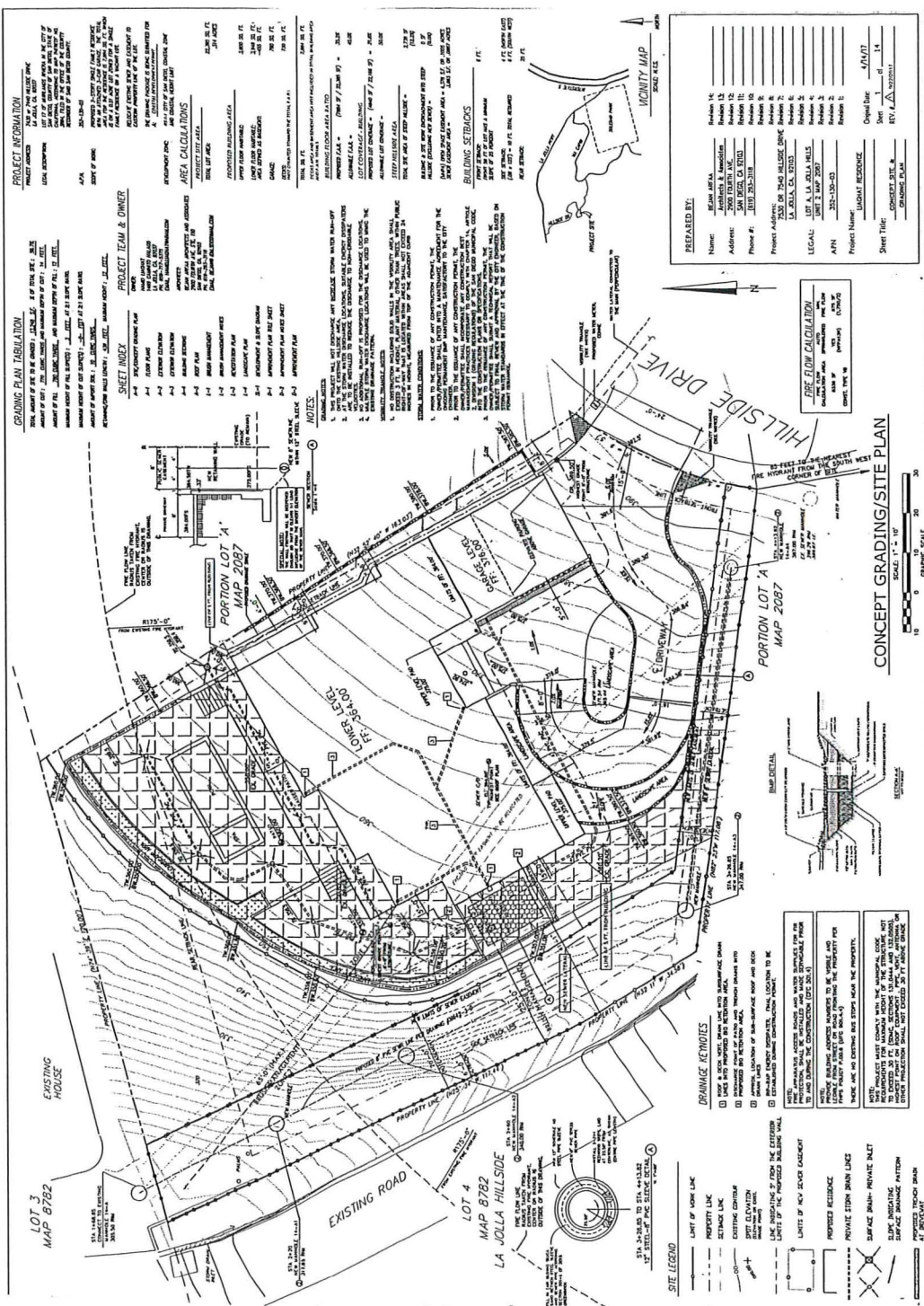
Jeff Szymanski
Senior Planner
Development Services Department

February 2, 2018
Date of Draft Report

May 14, 2018
Date of Final Report

Analyst: J. Szymanski

Attachments: Initial Study Checklist
Figure 1 – Location Map
Figure 2 – Site Plan
Figure 3- MHPA/BLA Plan



Site Map
Liaghat / Project No. 503701
City of San Diego – Development Services Department



Letter	Author	Address	Date
A	State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	1400 10 th Street P.O. Box 3044 Sacramento, California 95812- 3040	November 6, 2018
B	State of California, Native American Heritage Commission	1550 Harbor Blvd., Suite 100 West Sacramento, CA 95691	February 9, 2018
C	Viejas	P.O. Box 908 Alpine, CA 91903 #1 Viejas Grade Road Alpine, CA 91901	February 8, 2018
D	Rincon Band of Luiseno Indians, Cultural Resources Department	1 West Tribal Road, Valley Center, California 92082	February 8, 2018
E	Diane Kane	Dkane002@san.rr.com	March 5, 2018
F	Barbara Scott Majure	bama@ucsd.edu	March 5, 2018
G	Joseph Manno	jma2ma@san.rr.com	March 5, 2018
H	Ann and John Gilchrist	qanne4551@gmail.com	March 5, 2018
I	Beatrice Hughes		December 13, 2013
J	Robert Steck, President of The La Jolla Community Planning Association	Robert.steck@ml.com	March 2, 2018
K	Joseph J. Manno	jma2ma@san.rr.com	February 13, 2018
L	Judy Benson	jrbenson@mac.com	February 12, 2018
M	Barbara Scott Majure	bama@ucsd.edu	February 10, 2018
N	John Gilchrist	jmgilchrist@aol.com	

LETTER A



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

March 6, 2018

Jeffrey Szymanski
City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

Subject: Liaghat Hillside Vacation
SCH#: 2018021004

Dear Jeffrey Szymanski:

- ① The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 5, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

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 contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-445-0613 FAX 1-916-558-3164 www.opr.ca.gov

STATE OF CALIFORNIA, STATE CLEARINGHOUSE AND PLANNING UNIT (March 6, 2018)

Letter A

1. The letter from the State Clearinghouse acknowledges that the project complies with their review requirements for draft environmental documents. No additional response is necessary.

LETTER A

**Document Details Report
State Clearinghouse Data Base**

Letter A

No response is required.

SCH#	2018021004				
Project Title	Liaghat Hillside Vacation				
Lead Agency	San Diego, City of				

Type	MND Mitigated Negative Declaration				
Description	Coastal development permit, site development permit, boundary line adjustment and a sewer easement vacation for a sewer esement vacation to allow the construction of a 7,884 sf of two story residence. The sf includes a 3,600 upper floor, a 3,949 sf second floor, a 790 sf garage and 730 sf of decks. The decks and basement are not included in the overall 7,884 sf. The project is situated on a vacant .514 acre lot on the west side of Hillside Dr. Due to an encroachment into the multi-habitat planning area a boundary line adjustment is required.				

Lead Agency Contact

Name	Jeffrey Szymanski		Fax		
Agency	City of San Diego				
Phone	(619) 446-5324				
email					
Address	1222 First Avenue, MS-501				
City	San Diego	State	CA	Zip	92101

Project Location

County	San Diego				
City	La Jolla				
Region					
Lat / Long	32.872112° N / 117.248112° W				
Cross Streets	Hillside Dr and Soledad Ave				
Parcel No.	352-13-0030				
Township	15S	Range	4W	Section	Base

Proximity to:

Highways	I-5
Airports	
Railways	The Coater
Waterways	Pacific Ocean
Schools	Torrey Pines ES
Land Use	residential/natural park

Project Issues Archaeologic-Historic; Biological Resources

Reviewing Agencies	Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission; State Lands Commission
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Date Received	02/02/2018	Start of Review	02/02/2018	End of Review	03/05/2018
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Note: Blanks in data fields result from insufficient information provided by lead agency.

STATE OF CALIFORNIA
 NATIVE AMERICAN HERITAGE COMMISSION
 Environmental and Cultural Department
 1550 Harbor Blvd., Suite 100
 West Sacramento, CA 95691
 Phone (916) 373-3710
 Fax (916) 373-5471

Edmund G. Brown Jr., Governor



February 9, 2018

Jeffrey Szymanski
 City of San Diego
 1222 First Avenue MS 501
 San Diego, CA 92101

Sent via e-mail: DSDEAS@sandiego.gov

Re: SCH# 2018021004, Liaghat Hillside Vacation Project, Community of La Jolla; San Diego County, California

Dear Mr. Szymanski:

The Native American Heritage Commission (NAHC) has reviewed the Mitigated Negative Declaration (MND) prepared for the project referenced above. The review included the Introduction and Project Description, and the Initial Study Checklist, sections V, Cultural Resources and XVII, Tribal Cultural Resources, prepared by the City of San Diego. We have the following concerns:

- ① • Mitigation for inadvertent finds of Archaeological Resources, Cultural Resources, Tribal Cultural Resources, or Human Remains is missing or incomplete. The Archaeological Resources documentation in the MND itself notes that the project is in an area of archaeological sensitivity and requires special considerations. Standard mitigation measures should be included in the document. Please refer to Health and Safety Code § 7050.5 and Public Resources Code § 5097.98 for the process for inadvertent finds of human remains. For sample mitigation measures for Tribal Cultural Resources, please refer to California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-Appendix-G-text-Submitted.pdf>

- ② ADDITIONAL INFORMATION:
 The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

- ③ CEQA was amended in 2014 by Assembly Bill 52. (AB 52).⁴ AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015. AB 52 created a separate category for "tribal cultural resources", that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."⁵ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁶ Your project may also be subject to Senate Bill 18 (SB 18) (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. Both SB 18 and AB 52 have tribal consultation requirements. Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalC/PAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

¹ Pub. Resources Code § 21080 et seq.

² Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b); CEQA Guidelines Section 15084.5 (b)

³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1); CEQA Guidelines § 15084 (a)(1)

⁴ Government Code 65352.3

⁵ Pub. Resources Code § 21074

⁶ Pub. Resources Code § 21084.2

⁷ Pub. Resources Code § 21084.3 (a)

⁸ 164 U.S.C. 300101, 36 C.F.R. § 800 et seq.

NATIVE AMERICAN HERITAGE COMMISSION (2/9/2018)

Letter B

1. Please refer to Section V.a) of the Initial Study Checklist. An archaeological survey report was conducted for the project and did not identify historical resources. Qualified archaeological City staff reviewed the project and the archaeological report and based upon the negative survey report and the disturbed nature of the site City staff determined that historical resources would not be impacted as part of the project. Because no significant impacts would occur mitigation would not be required.

2. Please see Response number B1. There were no significant historical resources identified at the project site and a substantial adverse change would not occur.

3. The project is subject to AB 52 and the City has complied. Please see Section XVII. for a full discussion of the issue.

LETTER B

④ The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

⑤ A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at gayle.totton@nahc.ca.gov or call (916) 373-3714 if you have any questions.

Sincerely,



Gayle Totton, B.S., M.A., Ph.D
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse

NATIVE AMERICAN HERITAGE COMMISSION (2/9/2018)

Letter B

4. The City has consulted with all the Native American tribes that are traditionally and culturally affiliated with the geographic area of the project.

5. Comment noted.

Letter B

No response is required.

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.⁹ and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18).¹⁰

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects.¹¹

1. The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.¹²

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.¹³

If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.¹⁴

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁵

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.¹⁶

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b).¹⁷

An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.¹⁸

⁹ Pub. Resources Code § 21080.3.1, subd. (d) and (e)

¹⁰ Pub. Resources Code § 21080.3.1 (b)

¹¹ Pub. Resources Code § 21080.3.2 (a)

¹² Pub. Resources Code § 21080.3.2 (a)

¹³ Pub. Resources Code § 21082.3 (c)(1)

¹⁴ Pub. Resources Code § 21082.3 (b)

¹⁵ Pub. Resources Code § 21080.3.2 (b)

¹⁶ Pub. Resources Code § 21082.3 (a)

¹⁷ Pub. Resources Code § 21082.3 (e)

¹⁸ Pub. Resources Code § 21082.3 (d)

LETTER B

This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.¹⁹
- **There is no Statutory Time Limit on Tribal Consultation under the law.**
- **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research,²⁰ the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.²¹
- **Conclusion Tribal Consultation:** Consultation should be concluded at the point in which:
 - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.²²

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
 - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
 - The request form can be found at <http://nabc.ca.gov/resources/forms/>.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=10688) for an archaeological records search. The records search will determine:
 - If part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have been already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

NATIVE AMERICAN HERITAGE COMMISSION (2/9/2018)

Letter B

No response is required.

¹⁹ (Gov. Code § 65352.3 (a)(2)).

²⁰ pursuant to Gov. Code section 65040.2.

²¹ (Gov. Code § 65352.3 (b)).

²² (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

LETTER B

- o Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
- o Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- o Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.²³
- o Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.²⁴

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- o Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.²⁵ In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- o Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- o Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

NATIVE AMERICAN HERITAGE COMMISSION (2/9/2018)

Letter B

No response is required.

²³ (Civ. Code § 815.3 (c)).

²⁴ (Pub. Resources Code § 5097.991).

²⁵ per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).

VIEJAS

TRIBAL GOVERNMENT

P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

Phone: 619/445-3810
Fax: 619/445-5337
viejas.com

February 8, 2018

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

RE: Liaghat Residence Project

Dear Mr. Szymanski,

- 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.

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.

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

VIEJAS (2/8/2018)

Letter C

1. Please refer to Section V.a) of the Initial Study Checklist. An archaeological survey and evaluation was conducted at the project site which did not identify historical resources within the project site. The report also demonstrated that the site was disturbed to the point where historical resources would not be present. Additionally, qualified archaeological City staff reviewed the project and the archaeological report and agreed with the determination that historical resources would not be impacted as part of the project.

Also, please refer to Section XVII. of the Initial Study Checklist. Consultation with two Kumeyaay bands was conducted and the determination was made that Tribal Cultural Resources were not located at the project site and that an archaeological or a Native American monitor would not be required.

LETTER D

RINCON BAND OF LUISEÑO INDIANS
Cultural Resources Department

1 W. Tribal Road • Valley Center, California 92082 •
(760) 297-2330 Fax: (760) 297-2339



February 8, 2018

Jeff Szymanski
The City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Liaghat Residence Project No. 503701

Dear Mr. Szymanski:

This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the Liaghat Residence Project No. 503701. Rincon is submitting these comments concerning your projects potential impact on Luiseño cultural resources.

- ① The Rincon Band has concerns for the impacts to historic and cultural resources and the finding of items of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is not within the Luiseño Aboriginal Territory. We recommend that you locate a tribe within the project area to receive direction on how to handle any inadvertent findings according to their customs and traditions.

If you would like information on tribes within your project area, please contact the Native American Heritage Commission and they will assist with a referral.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Destiny Colocho
Manager
Rincon Cultural Resources Department

RINCON BAND OF LUISEÑO INDIANS (2/8/2018)

Letter D

1. Comment noted.

Bo Mazzetti
Tribal Chairman

Fishmall Turner
Vice Chairwoman

Steve Stallings
Council Member

Laurie E. Gonzalez
Council Member

Alfonso Kolb
Council Member

LETTER E

Mr. Jeff Szymanski
Senior Planner, Development Services
City of San Diego
1222 First Avenue, MS-501, San Diego, CA

March 5, 2018

RE: Response to MND for Project No: S03701
Liaghat Residence, 7430 Hillside Drive, La Jolla

Dear Mr. Szymanski,

① According to Section 15355(b) of the CEQA Guidelines, "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." There are 12 projects recently completed, under construction, or seeking permit approvals on Hillside Drive within a 1/4 mile radius of the Liaghat Project (See Attachment A). This concentrated development has already had significant, yet unacknowledged, cumulative impacts to neighborhood safety, road condition and storm water system capacity that require mitigation, as discussed below.

② The Liaghat Project is located on Hillside Drive, a steep, narrow (18 ft.) and winding street with tight curves and limited sightlines. Initial road construction was executed directly on native soils that are silty and geo-technically unstable. Although the 1920s concrete roadbed was asphalt sealed at some time in the past, the road is currently in poor condition, with pavement cracks exposing the underlying roadbed in several locations. Cracking is most pronounced where sewer laterals related to new construction have tied into the existing sewer main. Water sheet flows into the street where short culverts direct it into the area's natural canyons. The increased volume and velocity of sheet flow associated with new construction is undermining the pavement at these location, increasing the probability of slope failure

The roadbed and public safety have been further impacted by "temporary" construction activities that engage enormous and very heavy equipment the road was never designed to handle. One project has been under construction for seven years, another is entering its third year. The truck weight is hastening deterioration of already fragile paving. There are no immediate plans or funding for street repair, while past repairs have been sloppy and inadequate. In several locations, the road functions as a single lane due to poor pavement.

Continuous construction projects within the area are turning "temporary" inconveniences into a permanent condition. This is particularly true of construction-related parking. Due to steep terrain, Hillside Drive is routinely used for heavy equipment staging, materials storage and worker parking. Although there is no LEGAL parking anywhere on Hillside Drive, there is no enforcement of the daily parking violations. The street is often blocked by heavy construction

DIANE KANE (3/5/2018)

Letter E

1. This comment introduces an argument that the project would result in cumulative CEQA impacts associated with neighborhood safety, road conditions and storm water.

2. The comment provides an historical description of the construction of Hillside Drive and also provides commentary on existing conditions. The comment states the author's opinion regarding the unstable conditions of the nearby slopes and the road. Included in the comment letter is an attachment depicting other projects in the vicinity (Attachment E-1).

The comment argues that there is an existing safety concern related to Hillside Drive and that the Liaghat Residence project would contribute to this concern. The commenter attributes the existing road conditions to geo-technically unstable soil, heavy temporary construction traffic and illegal construction-related parking in the neighborhood. The comment also opines that "the increased volume and velocity of sheet flow associated with new construction is undermining the pavement at these location, increasing the probability of slope failure".

CEQA Section 15064 (h) (4) states that the mere existence of potential significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable. Therefore, cumulative impacts from an incremental contribution would not necessarily occur solely based on the fact that there are impacts from other projects.

Specifically in the case of the Liaghat Residence the state of Hillside Drive is an existing condition and the project would be required to comply with all laws and regulations for the use of Hillside Drive. A traffic control plan would be a requirement of the project and no staging of construction related material would be allowed. In terms of the allegations regarding increased volume and velocity the design of the project's storm water Best Management Practices (BMPs) would ensure that existing conditions would not change. A Storm Water Quality Management Plan (SWQMP) and a Drainage Study for the project site were provided to ensure that the project demonstrates compliance with the current City Storm Water Manual and Drainage Design Manual. The SWQMP addressed water quality and the hydromodification management plan to ensure the runoff generated by the post-development is being treated and discharged at the same rate as pre-development. The drainage study addressed mitigating peak flows and mimicked the pre-development drainage pattern. Therefore, the proposed project will not negatively impact the downstream storm drain system and/or adjacent properties. The project is not adding an incremental contribution to the existing storm water condition and in accordance with CEQA Section 15130 (a) (1) a project that makes no contribution to a potential significant cumulative effect is not cumulatively considerable or significant.

equipment and delivery trucks, with limited traffic control. Current conditions in the project vicinity are already hazardous. There is justifiable concern that the Liaghat project will further contribute to an unacknowledged cumulative impact to public safety.

③ VIII. HAZARDS AND HAZARDOUS MATERIALS

Based on neighborhood experience with the six other nearby projects on Hillside Drive, there is widespread skepticism that "all construction activities will occur on site." During community review, the applicant candidly admitted that early stages of construction would use the street as a staging area, since the buildable pad is 20-40 feet below street level. Blocking the street with construction-related vehicles, materials storage and illegal parking on a blind curve is a safety hazard. There is no potential for detours around this location if the street is blocked, so there will be a severe impact to street function. Because Police enforcement has been absent, it is an ineffective mitigation solution.

- ④ The Development Permit Review Committee therefore asked the project applicant, Hamid Liaghat, to demonstrate on-site constructability through a conceptual construction management plan at the February 21, 2018 meeting. After committee and public review, the plan was accepted as an adequate mitigation measure for direct construction impacts to Hillside Drive associated with worker parking, construction equipment and materials storage. New Exhibit A Sheets A-A, A-B, A-C were included in the drawing set and labeled "Mitigation for Cumulative Safety Impacts to Hillside Drive associated with worker parking, construction equipment and materials storage." Applicant will submit construction management plan drawings, along with a handwritten signed statement, that he will be personally responsible for site management during construction and will meet weekly with neighbors within 300 feet to resolve concerns. These provisions should be added to the environmental document as mitigation and become a condition of project approval.

Despite this project-related mitigation for direct construction impacts, there are still project-related cumulative impacts that are not addressed nor mitigated, as noted below:

⑤ IX. HYDROLOGY AND WATER QUALITY

There is no complete storm water system on Hillside Drive of the north face of Mt. Soledad. Whatever system does exist is increasingly inadequate for existing structures. Storm water sheet flows down slopes into the street, where short culverts direct surface run-off into the area's natural canyons. As building construction and related hardscape has intensified, run-off has dramatically increased. This is most hazardous to downslope properties on lower Hillside Drive, Soledad Avenue and Lookout Drive, where I live. There has been no requirement for any of the new Hillside projects to contribute to the effectiveness of this antiquated and undersized "system." Even a single property is adding to the unacknowledged cumulative impact of system overload. Cumulative Storm Water run-off impacts should be analyzed and mitigated.

XVI. TRANSPORTATION/TRAFFIC

Hillside Drive is a designated emergency access route in the La Jolla Community Plan.

Letter E

3. Staging of construction related material in the Public Right of Way is typically not permissible. The comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.


4. EAS staff acknowledges that the applicant and interested parties have been in contact and have formulated agreements. According to this comment provisions have been made by the applicant including new exhibit sheets which address construction staging and construction traffic. (Please see attachment sheets E2- E4) However, since a significant impact has not been identified by the City the provided provisions cannot be made mitigation requirements. Any agreement between the applicant and the interested parties are between two private parties. Additionally, the comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.

5. The comment repeats a concern that the project would result in a cumulative impact as it relates to storm water sheet flow and that storm water should be analyzed and mitigation should be required. Please see section IX of the Initial Study, storm water and hydrology has been analyzed in the MND and impacts were not identified. The design of the project's storm water Best Management Practices (BMPs) would ensure that existing conditions would not change. A Storm Water Quality Management Plan (SWQMP) and a Drainage Study for the project site were provided to ensure that the project demonstrates compliance with the current City Storm Water Manual and Drainage Design Manual. The SWQMP addressed water quality and the hydromodification management plan to ensure that the runoff generated by the post-development is being treated and discharged at the same rate as pre-development. The drainage study addressed mitigating peak flows and mimicked the pre-development drainage pattern. Therefore, the proposed project will not negatively impact the downstream storm drain system and/or adjacent properties. The project is not adding an incremental contribution to the existing storm water condition and in accordance with CEQA Section 15130 (a) (1) a project that makes no contribution to a potential significant cumulative effect is not cumulatively considerable or significant.

LETTER E

- ⑥ The road is in poor condition, with increasing probability of slope failure. There are no immediate plans or funding for street repair, while past repairs have been sloppy and inadequate. If the road fails, local emergency response services will be greatly impaired and the local circulation network will be disrupted. The condition of Hillside Drive should be evaluated and mitigation for cumulative deterioration from construction activities mitigated.

Sincerely,



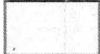



Diane Kane, Ph.D., AICP
7711 Lookout Drive
La Jolla, CA 92037

Letter E

6. Please see response number E2. A significant impact to the road has not been identified.

12 PROJECTS in ½ Mile!!

-  Recently Completed
-  Under Construction
-  Under Review
-  Pending

7687 Hillside
2 lots
LJ Shores PRC

7677 Hillside
50% Remodel
Ministerial Review

1830 Puente
DPR

7540 Hillside
DPR

Hillside Dr. is the boundary
between two community
review groups.

La Jolla DPR

Projects on Hillside
Dr.

La Jolla Shores PDO &
La Jolla Shores PRC





Exhibit A

During construction, the following steps will be taken to minimize the construction impact to the neighborhood.

- 1- During construction, we will comply with the construction standards of City of San Diego codes.
- 2- We will shuttle the construction workers from their vehicles to the project site in the morning and from the project site to their vehicles at the end of the day in order to avoid parking on Hillside Drive. Once our driveway from Hillside Drive to the house pad and the concrete garage roof are in place, we will have more than eight parking spaces on our property for our construction workers.
- 3- For concrete placement or unloading of materials, we will apply for a traffic control permit and use flagmen to control traffic if we need to use the street. After placing concrete garage roof, all the concrete foundation/slab placement and material unloading will take place from our property.
- 4- We will implement approved SWPP Plan.
- 5- We will display project address at all times.
- 6- We will provide concave mirrors at both sides of the curve to enhance restricted sightlines, if the adjacent property owners allow us to do that.
- 7- Project owner or his representative will hold weekly meeting with neighbors of within 300 feet from project and owner phone number will be provided.

PROPOSED EXHIBIT A AND CONSTRUCTION SEQUENCE PLAN



2900 Fourth Ave.
Suite 110
San Diego, CA
92103
PH.619 293-3118
FX.619 293-3419

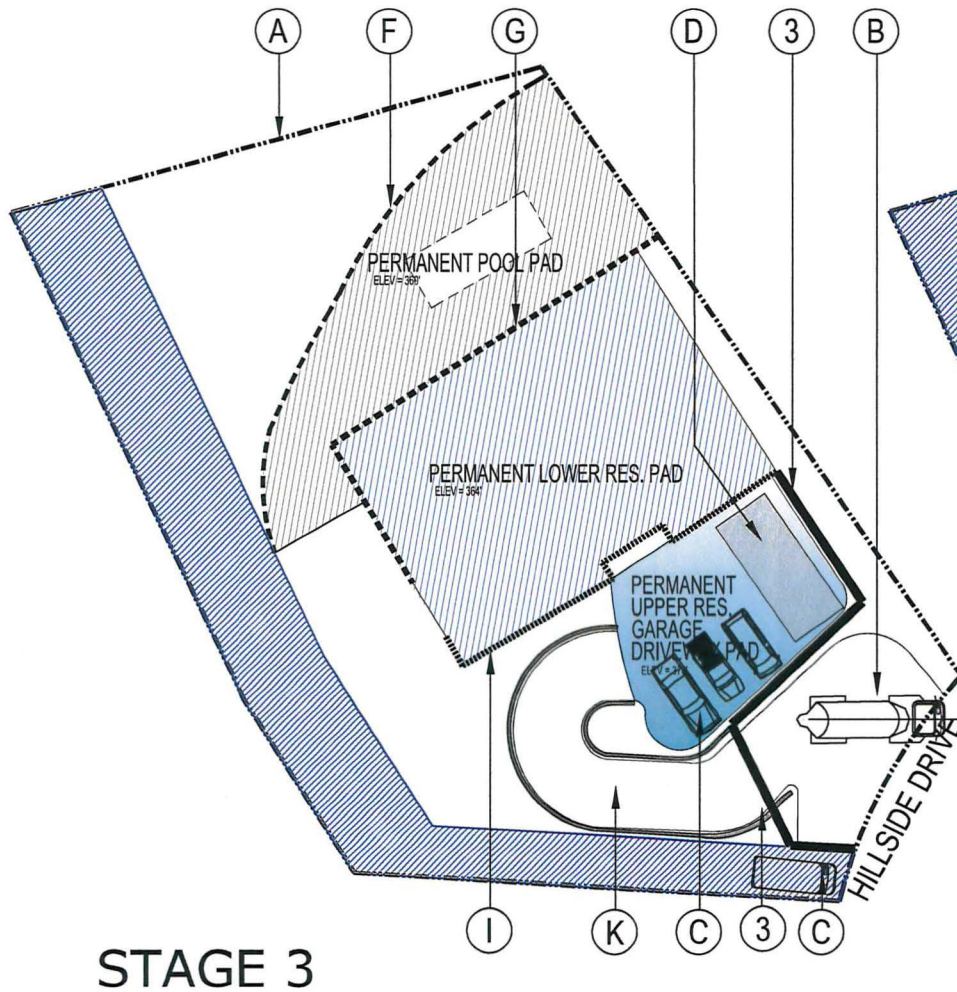
LIAGHAT RESIDENCE
HILLSIDE DRIVE
LA JOLLA, CA.

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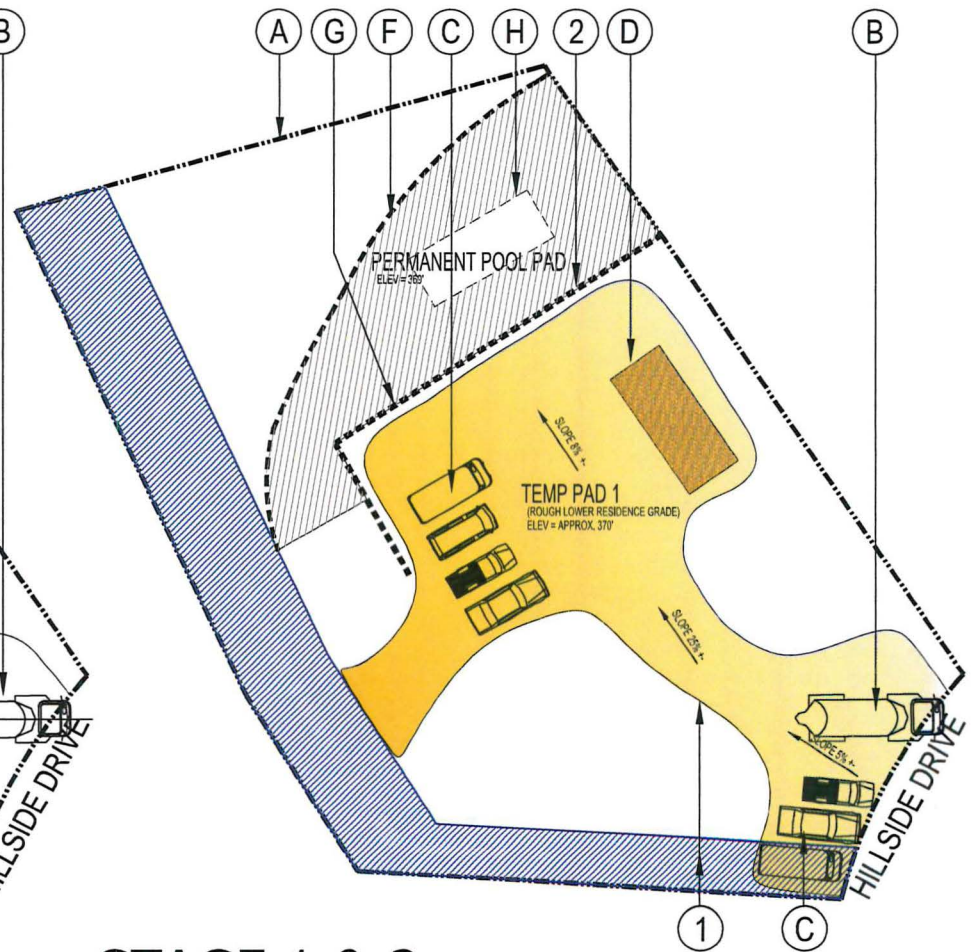
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DATE	
SCALE	
FILE	
DRAWING NO.	

A-A



STAGE 3



STAGE 1 & 2

KEY NOTES :

- PROPOSED SEQUENCE : (WILL BE VERIFIED AND COULD BE MODIFIED WHEN GENERAL CONTRACTOR IS ONBOARD).
1. CONSTRUCT TEMPORARY ROAD TO TEMPORARY STAGING PAD 1 TO INSTALL SINKER, THE WESTERLY SITE RETAINING WALLS AND THE PERMANENT POOL PAD.
 2. FROM TEMPORARY STAGING PAD 1, INSTALL LOWER RESIDENCE RETAINING WALLS & GRADE TO ROUGH LOWER RESIDENCE GRADE LEVEL (364').
 3. FROM ROUGH UPPER RESIDENCE GRADE (376') INSTALL TEMPORARY GARAGE SHORING & UPPER SITE RETAINING WALLS.
 4. FROM ROUGH LOWER RESIDENCE GRADE LEVEL (364') INSTALL UPPER RESIDENCE RETAINING WALLS, PERMANENT DRIVEWAY RETAINING WALLS & BACKFILL DRIVEWAY TO PERMANENT UPPER RESIDENCE-DRIVEWAY GRADE LEVEL PAD (376').
 5. POUR PERMANENT STRUCTURAL CONCRETE GARAGE ROOF/PARKING DECK (ELEV= APPROX. 387').

KEY SYMBOLS :

- A. PROPERTY LINE
- B. LARGE TRUCK STAGING & OR TEMPORARY MATERIALS OFF LOADING ZONE.
- C. TEMPORARY CONSTRUCTING PARKING
- D. MATERIAL STAGING & OR TEMPORARY STORAGE.
- E. TEMPORARY SHORING LOCATION
- F. WEST SITE RETAINING WALLS
- G. LOWER RESIDENCE RETAINING WALLS
- H. FUTURE POOL LOCATION
- I. UPPER RESIDENCE RETAINING WALL
- J. NEW SEWER LINE
- K. NEW DRIVEWAY RAMP



BEJAN
ARFAA
ARCHITECTS
&
ASSOCIATES

2800 Fourth Ave.
Suite 110
San Diego, CA
92103
PH: 619 253-3115
FX: 619 253-3419

LIAGHAT RESIDENCE
LA JOLLA, CA.
HILLSIDE DRIVE

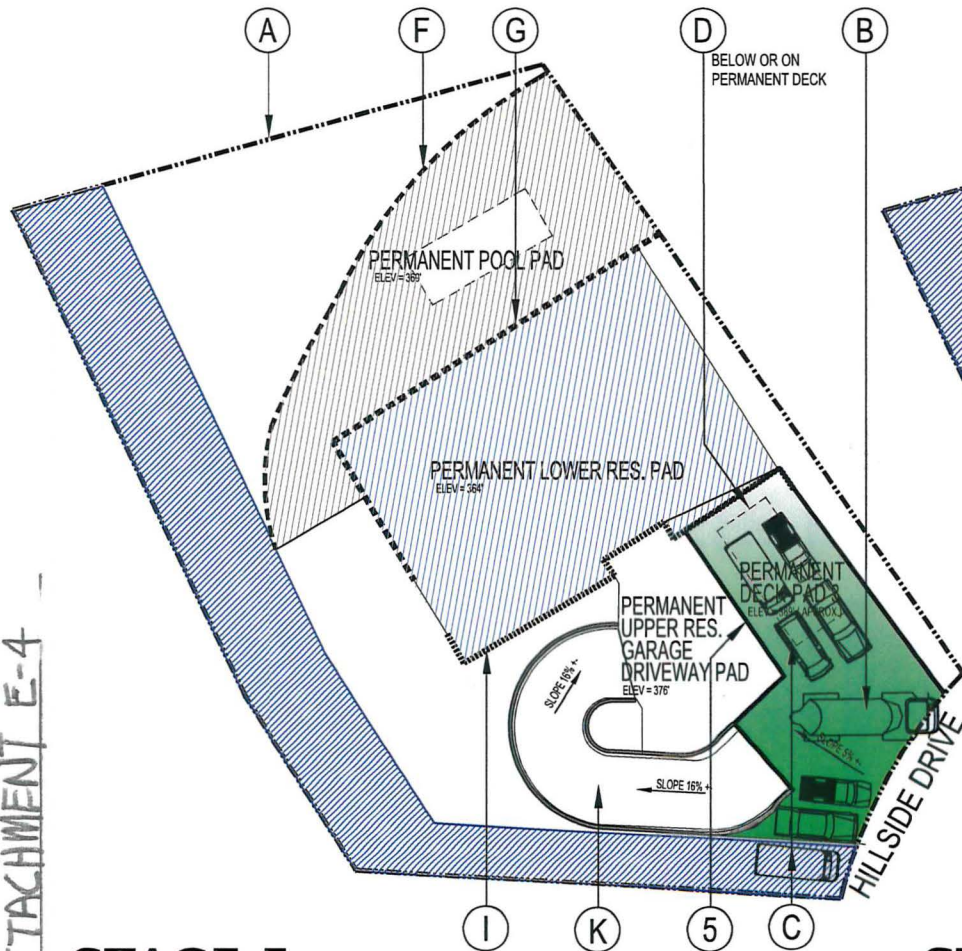


REVISIONS

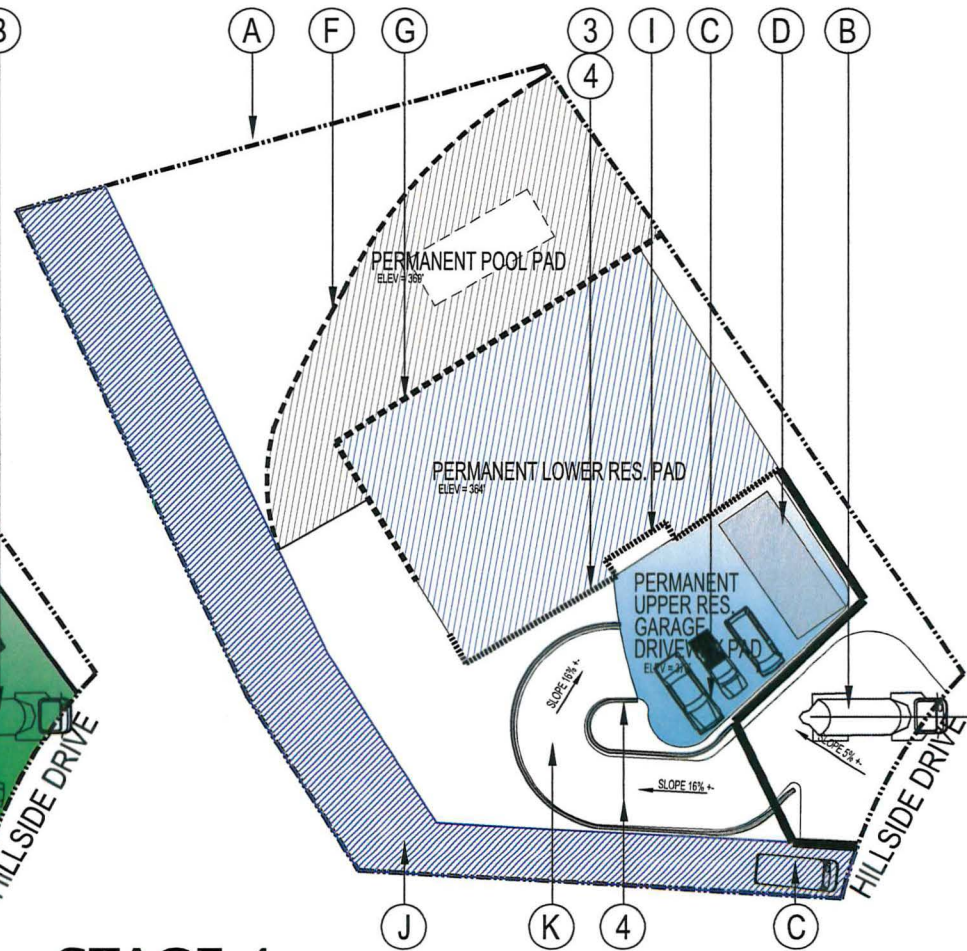
NO.	DATE	SCALE	FILE	DRAWING NO.

A-B

STAGE 5



STAGE 4



KEY NOTES :

- PROPOSED SEQUENCE : (WILL BE VERIFIED AND COULD BE MODIFIED WHEN GENERAL CONTRACTOR IS ONBOARD).
1. CONSTRUCT TEMPORARY ROAD TO TEMPORARY STAGING PAD 1 TO INSTALL SEWER, THE WESTERLY SITE RETAINING WALLS AND THE PERMANENT POOL PAD.
 2. FROM TEMPORARY STAGING PAD 1, INSTALL LOWER RESIDENCE RETAINING WALLS & GRADE TO ROUGH LOWER RESIDENCE GRADE LEVEL (364')
 3. FROM ROUGH UPPER RESIDENCE GRADE (376') INSTALL TEMPORARY GARAGE SHORING & UPPER SITE RETAINING WALLS
 4. FROM ROUGH LOWER RESIDENCE GRADE LEVEL (364') INSTALL UPPER RESIDENCE RETAINING WALLS, PERMANENT DRIVEWAY RETAINING WALLS & BACKFILL DRIVEWAY TO PERMANENT UPPER RESIDENCE-DRIVEWAY GRADE LEVEL PAD (376')
 5. POUR PERMANENT STRUCTURAL CONCRETE GARAGE ROOF/PARKING DECK (ELEV= APPROX. 389')

KEY SYMBOLS :

- A. PROPERTY LINE
- B. LARGE TRUCK STAGING & OR TEMPORARY MATERIALS OFF LOADING ZONE.
- C. TEMPORARY CONSTRUCTING PARKING
- D. MATERIAL STAGING & OR TEMPORARY STORAGE.
- E. TEMPORARY SHORING LOCATION
- F. WEST SITE RETAINING WALLS
- G. LOWER RESIDENCE RETAINING WALLS
- H. FUTURE POOL LOCATION
- I. UPPER RESIDENCE RETAINING WALL
- J. NEW SEWER LINE
- K. NEW DRIVEWAY RAMP



BEJAN
ARFAA
ARCHITECTS
ASSOCIATES

2509 Fourth Ave.
Suite 110
San Diego, CA
92105
PH: 619 293-3118
FX: 619 293-3419

LIAGHAT RESIDENCE
LA JOLLA, CA.
HILLSIDE DRIVE



REVISIONS

NO.	DATE	DESCRIPTION

DATE
SCALE
FILE

DRAWING NO.

A-C

LETTER F

Szymanski, Jeffrey

From: Barbara Scott Majure <bama@ucsd.edu>
Sent: Monday, March 05, 2018 2:20 PM
To: DSD EAS
Subject: RE: Response to MND for Project No: 503701

Mr. Jeff Szymanski
Senior Planner, Development Services
City of San Diego
1222 First Avenue, MS-501, San Diego, CA

March 5, 2018

RE: Response to MND for Project No: 503701 Liaghat Residence, 7430 Hillside Drive, La Jolla

Dear Mr. Szymanski,

- ① I support the comments approved by the La Jolla Community Planning Association at its March 1, 2018 meeting regarding deficiencies in the Liaghat project MND (Project No. 503701). I agree the MND is deficient in its disregard of direct impacts to public safety from worker and construction-related vehicle parking and materials storage blocking
- ② Hillside Drive. The project is located on a tight curve with limited visibility on a narrow, steep street. A construction staging plan developed by Mr. Liaghat and approved by the Development Permit Review Sub-Committee and the Community Planning Association should be incorporated into the conditions of approval for this project to avoid safety impacts to Hillside Drive.
- ③ Furthermore, the MND fails to address cumulative impacts to road condition and storm water run-off on Hillside Drive. The cumulative impacts of the Liaghat Project, in conjunction with 12 other projects that have been recently completed, are under construction or are in project review on Hillside Drive has exacerbated pavement deterioration and are overloading the limited capacity of the original storm water system developed in the 1920s. Public infrastructure impacts associated with construction activity and increases in impervious coverage need to be addressed in the MND.

Sincerely, Barbara

++++++
Barbara Scott Majure
7631 Hillside Drive.
La Jolla CA 92037
voice: 858-454-2326.
fax: 858-454-8250
email: bama@ucsd.edu
++++++

BARBARA SCOTT MAJURE (3/5/2018)

Letter F

1. This comment expresses support for the Letter from the La Jolla Community Planning Association (Letter J) and repeats similar concerns previously raised, please see response numbers E2 and E3. No additional response is required.
2. The comment raises similar issues that have been previously addressed. Please see response number E4. No additional response required.
3. Please see response number E2, CEQA Section 15064 (h) (4) states that the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable. Therefore, cumulative impacts from an incremental contribution would not necessarily occur solely based on the fact that there is an existing impact from other projects. Additionally, the project is not adding an incremental contribution to the existing storm water condition and in accordance with CEQA Section 15130 (a) (1) a project that makes no contribution to a potential significant cumulative effect is not cumulatively considerable or significant.

LETTER G

Szymanski, Jeffrey

From: Joseph Manno Assoc., Inc. <jma2jma@san.rr.com>
Sent: Monday, March 05, 2018 1:37 PM
To: DSD EAS
Cc: Councilmember Barbara Bry
Subject: RE: Liaghat Residence: Project No. 503701 / SCH No. Pending

Importance: High

Mr. Jeff Szymanski
Senior Planner, Development Services
City of San Diego
1222 First Avenue, MS-501, San Diego, CA

March 05, 2018

Re: Response to MND: Project No: 503701
Liaghat Residence, 7430 Hillside Drive, La Jolla

Dear Mr. Szymanski,

① I support the comments approved by the La Jolla Community Planning Association at its March 1, 2018 meeting regarding deficiencies in the Liaghat project MND (Project No. 503701). I agree the MND is deficient in its disregard of direct impacts to public safety from worker and construction-related vehicle parking and materials storage blocking Hillside Drive. The project is located on a tight curve with limited visibility on a narrow, steep street. A construction staging plan developed by Mr. Liaghat and approved by the Development Permit Review Sub-Committee and the Community Planning Association should be incorporated into the conditions of approval for this project to avoid safety impacts to Hillside Drive.

② Furthermore, the MND fails to address cumulative impacts to road condition and storm water run-off on Hillside Drive. The cumulative impacts of the Liaghat Project, in conjunction with 12 other projects that have been recently completed, are under construction or are in project review on Hillside Drive has exacerbated pavement deterioration and are overloading the limited capacity of the original storm water system developed in the 1920s. Public infrastructure impacts associated with construction activity and increases in impervious coverage need to be addressed in the MND.

Sincerely,

Joseph J. Manno
Nancy Anne Manno
2329 Rue de Anne
La Jolla, CA 92037

858.459.8849
jma2jma@san.rr.com

JOSEPH MANNO ASSOC. INC (3/5/2018)

Letter G

1. This comment expresses support for the Letter from the La Jolla Community Planning Association (Letter J) and repeats similar concerns previously raised, please see response number E2.
2. These issues were previously addressed. Please see response numbers E2 and E3.

Szymanski, Jeffrey

From: Anne Gilchrist <qanne4551@gmail.com>
 Sent: Monday, March 05, 2018 1:24 PM
 To: DSD EAS
 Cc: John Gilchrist
 Subject: Response to MND fo Project No. 503701 Liaghat Residence, 7430 Hillside Drive, La Jolla

Dear Mr. Szymanski,

- ① My husband and I support the comments approved by the La Jolla Community Planning Association at it's March 1,2018 meeting regarding deficiencies in the Liaghat project. We agree the MND is deficient in it's disregard of direct impacts to public safely from worker and construction related vehicle parking and materials's storage blocking Hillside Drive. The
- ② project is located o a tight curve with limited visibility on a narrow , steep street, which is very, very dangerous! A construction staging plan developed by Mr. Liaghat and approved by the Development Permit Review Sub-committee and the Community Planning Association should be incorporated into the conditions of approval for this project to avoid safety impacts to Hillside Drive.
- ③ Furthermore, the MND fails to address cumulative impact to road condition and storm water run-off on Hillside Drive. The cumulative impacts of the Liaghat Project, in conjunction with 12 other projects that have been recently completed, or under construction far too long,has exacerbated pavement deterioration and are overloading the limited capacity of the original storm water system developed in the 1920s. Public infrastructure impacts associated with construction activity and increased in impervious coverage need to be addressed in the MND.

In our opinion this lot is unbuildable!

Sincerely,

Anne and John Gilchrist

ANN AND JOHN GILCHRIST (3/5/2018)

Letter H

1. This comment expresses support for the letter from the La Jolla Community Planning Association (Letter J) and repeats similar concerns previously raised, please see response numbers E2, E3, E4 and E5. No additional response is necessary.
2. The comment raises similar issues that have been previously addressed. Please see response numbers E3 and E4. No additional response required.
3. The comment raises similar issues that have been previously addressed. Please see response numbers E2, E3 and E5. No additional response is necessary. Additionally, the comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.

LETTER I

Mr. Jeff Szymanski
Senior Planner, Development Services
City of San Diego
1222 First Avenue, MS-501, San Diego, CA

Beatrice Hughes
7520 Hillside Drive
La Jolla, CA 92037

March 5, 2018

RE: Response to MND for Project No: 503701
Liaghat Residence, 7430 Hillside Drive, La Jolla

Dear Mr. Szymanski,

As the neighbor immediately south of the proposed Liaghat project, and as a 60 year resident of Hillside Drive, I would like to share the following major concerns, which are the basis for neighborhood opposition to further densification on Hillside Drive:

- ① I. Upper Hillside Drive was built by the Army to reach a lookout. It is not to City street requirements. It is 17 feet wide, winding with blind curves and in a geologically unstable area along a steep hillside.

The Hillside ordinance restricts building to below 25% slope grade. The La Jolla Shore ordinance which applies to one side of Hillside Drive does not require setbacks from the street.

- ② II. Due to instability of the ground, residents on Hillside Drive have suffered subsidence. Heavy trucks and construction equipment are parking in the narrow street in the "No Parking Zone." So do service trucks and visitors, causing access restrictions and blockage often behind a blind curve.

Homes are built or expanded with no off-street parking. Should any part of Hillside Drive be damaged and need to be closed for repairs, which would be substantial, the entire neighborhood will be left without access or exit. The street already is in bad condition and requires substantial repairs.

- ③ III. The narrow, sloping and winding Hillside Drive has become a detour for traffic going through the so called "Throat" at the Torrey Pines and La Jolla Parkway intersection, which often suffers huge backups. Drivers trying to avoid a lengthy wait take the Hillside Drive as their alternate route. However, to make up time for the longer distance of the detour, drive as fast as they can muster, in stark violation of posted speed limits. Worse yet, due to the narrow and curvy street, they end up driving in the middle or wrong side of the street around blind curves. As the posted speed limits are absolutely not enforced, Hillside Drive has become a hazardous street

BEATRICE HUGHES (3/5/2018)

Letter I

1. Please see response number E2. The City of San Diego Municipal Code does limit projects which contains steep hillsides to a maximum of 25 % development. However, steep hillsides as it is defined in the Land Development Code, Section 113.0103 and Steep Hillside Guidelines, page 2 & 3, are not present on site. Additionally, the comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.
2. The comment raises similar issues that have been previously addressed. Additionally, the comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.
3. The comment raises similar issues that have been previously addressed. Please see response number E2.

LETTER I

to drive, and particularly for those residents who live near a blind curve. It is often impossible to get out of the driveway safely. We pray for some enforcement of the existing speed limits.

④ IV. A permit was issued about thirty years ago for construction on a lot with access from Hillside Drive to a steep parcel designated as an open space. The parcel has no frontage to the street, but is accessed by a narrow steep drive in the canyon which receives the drainage of 10 or more acres above it. The residence required a 45+ foot fire wall for protection from wildfires, where the maximum height for retaining walls is 7 ft. Although it was required to be finished in a timely manner, the project was abandoned. The firewall and driveway suffered decay and subsidence, while the hillside was defaced. A dumpster was left to rust. What was once a native vegetated lovely hillside is now an eyesore. Hillside Drive, once the loveliest street in town is now a nightmare.

⑤ I ask the city to enforce the HR Ordinance and provide environmental protection for remaining hillsides to avoid a repeating the above situation by:

1. Not permitting future densification of Hillside Drive
2. Not permitting building in unstable areas and on steep slopes
3. Not permitting building or other activities which need street or neighbor private driveways for parking on Hillside Drive
4. Enforcing the No Parking Zone
5. Enforcing speed limits
6. Regarding the geology of the land.

Respectfully submitted by,

Beatrice Hughes

Letter I

4. This comment provides a description of a project from 30 years ago that occurred on Hillside Drive. There is no correlation between the proposed project and past nuisances in the area. In this case the assertion that there could be an impact based on past experiences is speculative and does not constitute substantial evidence as explained CEQA Section 15384.

5. This comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.

LETTER J

Mr. Jeff Szymanski
Senior Planner, Development Services
City of San Diego
1222 First Avenue, MS-501, San Diego, CA

March 2, 2018

RE: Response to MND for Project No: 503701
Liaghat Residence, 7430 Hillside Drive, La Jolla

Dear Mr. Szymanski,

The La Jolla Community Planning Association would like to comment on the Mitigated Negative Declaration prepared for the Liaghat project at 7430 Hillside Drive, La Jolla.

- ① We agree that there are project-related direct impacts to native flora and fauna located in the Natural Reserve adjacent to the project property and we find the proposed mitigation adequate. However, we disagree with the findings in Section VIII. Hazards and Hazardous Materials that the project will not result in direct and cumulative impacts to the neighborhood.
- ② According to Section 15355(b) of the CEQA Guidelines, "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." There are 12 projects recently completed, under construction, or seeking permit approvals on Hillside Drive within a 1/4 mile radius of the Liaghat Project (See Attachment A). Hillside Drive is an old military road that features a steep, narrow (18 ft.) and winding alignment with tight curves and limited sightlines. It was never designed, nor intended, to accommodate current traffic. It is in poor condition, exacerbated by recent construction. This concentrated development has already had significant, yet unacknowledged, cumulative impacts to neighborhood safety.
- ③ Continuous construction is turning "temporary" inconveniences, such as construction-related parking, into a permanent condition. Hillside Drive is a dedicated emergency access route in the La Jolla Community Plan. There is no LEGAL parking anywhere on Hillside Drive, where 30 "No Parking" signs line both sides of the street. Due to steep terrain, Hillside Drive is routinely used for heavy equipment staging, materials storage and worker parking. The street is often blocked by huge construction equipment and delivery trucks, with limited or non-existent traffic control. Much of this activity is unauthorized. There is no police enforcement of the daily parking violations. Conditions in the project vicinity are already hazardous. There is justifiable concern that the Liaghat project will further contribute to an unacknowledged, but very real, direct and cumulative impact to public safety.

ROBERT STECK, PRESIDENT OF THE LA JOLLA COMMUNITY PLANNING ASSOCIATION (3/2/2018)

Letter J

1. The comment acknowledges that the LJCPA has no issues with the biological analysis section of the Draft MND. However, the comment introduces their objection to Section VIII. Hazards and Hazardous Materials section. No additional response is necessary under this comment.
2. The comment raises similar issues that have been previously addressed. Please see response number E2.
3. The comment raises similar issues that have been previously addressed. Please see response numbers E2 and E3.

LETTER J

④ Based on neighborhood experience with the six other nearby projects on Hillside Drive, there is widespread skepticism that "all construction activities will occur on site," as stated in Section VIII. *Hazards and Hazardous Materials* of the MND. During community review, the applicant candidly admitted that early stages of construction would use the street as a staging area, since the buildable pad is 20-40 feet below street level. Blocking the street with construction-related vehicles, materials storage and illegal parking on a blind curve is a safety hazard. If the street is blocked, there is no potential for detours around this location. There will be a severe impact to street function. Because police enforcement has been absent, it is an ineffective mitigation solution.

⑤ The La Jolla Community Planning Association therefore asked the project applicant, Hamid Liaghat, to demonstrate on-site constructability through a conceptual Construction Management Plan. At the February 21, 2018 meeting of the Development Permit Review Committee, Mr. Liaghat provided drawings (Attachment B) for five stages of construction:

1. Grub site, grade incline for vehicle access & create temporary 4,000 sq. ft. pad for parking, material delivery & equipment staging (approx. El. 370 Ft.).
2. Relocate sewer to side yard; Construct rear retaining walls & pool pad.
3. Install shoring for garage level parking pad (El. 365 ft.) and upper street level parking pad (El. 390 ft.); Construct CMU retaining walls for pads and build driveway.
4. Begin conventional home construction, using upper parking area, driveway and lower garage pad for parking and storage.
5. Complete project.

⑥ After committee and public review, the plan was accepted as adequate mitigation for direct and cumulative construction impacts to Hillside Drive associated with worker parking, construction equipment, and materials storage, which have been identified as a safety hazard. Mr. Liaghat will submit the following items in compliance with CEQA Environmental Review:

1. Exhibit A Sheets A-A, A-B, A-C: "Mitigation for Cumulative Safety Impacts to Hillside Drive associated with Worker Parking, Construction Equipment and Materials Storage";
2. A handwritten and signed statement that he will be personally responsible for site management during construction; and,
3. An agreement to meet weekly with neighbors within 300 feet to resolve concerns.

⑦ These provisions should be added to the MND as mitigation for community-identified Public Safety Hazards and become a condition of project approval.

⑧ Mr. Liaghat is to be commended for his thoughtful, responsive and voluntary efforts to address, and effectively mitigate, neighborhood concerns during the community review process.

Letter J

4. The comment raises similar issues that have been previously addressed. Please see responses number E2, E3 and E4. Additionally, the comment cites concerns that because of past projects that the proposed project would have a similar issues. There is no correlation between the proposed project and past nuisances in the area. Any assertion that there could be an impact based on past experiences is speculative and would not constitute substantial evidence as explained CEQA Section 15384.

5. The comment raises similar issues that have been previously addressed. Please see response number E4.

6. The comment raises similar issues that have been previously addressed. Please see responses number E4.

7. The comment raises similar issues that have been previously addressed. Please see responses number E4. Significant impacts under Public Safety Hazards have not been identified and mitigation is not required.

8. This comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.

LETTER J

⑨ The La Jolla Community Planning Association also recommends that:

1. Construction Management Plans be considered on all projects as part of community review; and,
2. They be required by the City to mitigate construction-related parking and storage impacts in difficult terrain, areas with constricted access, or constrained site conditions.

⑩ The La Jolla Community Planning Association also asks that repairs to rough pavement immediately south of the project area be completed prior to start of construction. A request for this work was submitted in early January and should be proceeding through appropriate street maintenance and repair channels. Assigning a high priority to this work will assist public safety, as it will enable the full width of the road to be used.

Sincerely,

Robert Steck
President, La Jolla Community Planning Association

Attachment A: Area Project Map
Attachment B: Exhibit A Sheets A-A, A-B, A-C

Letter J

9. This comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.

10. This comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.

LETTER K

February 13, 2018

Mr. Jeff Sysmanski
Senior Planner, Development Services
City of San Diego
1222 First Avenue, MS-501, San Diego, CA

Dear Mr. Szymanski:

We have reviewed the Draft MND, published 02.02.2018 re:
Liaghat Residence / Project No. 503701

- ① We find the Draft MND document deficient in multiple areas. We take specific exception to those paragraphs: VIII. HAZARDS AND HAZARDOUS MATERIALS, relating to safety hazards impacting emergency response and emergency evacuation.
- ② And to those paragraphs describing the significance/ relationship to "wildland fires." The project site is surrounded by brush covered, steep canyons. Access to a residence fire on Hillside Drive or to a canyon brush fire in the adjacent Hillside Drive area by Fire-Rescue vehicles is impeded / impacted.
- ③ We also take specific exception to: XVI. TRANSPORTATION/TRAFFIC, and to those paragraphs relating to safety hazard impacts and to both permanent and cumulative construction related impacts to Hillside Drive.

These above quoted responses / determinations are patently false. We assume no one ... certainly not the author of these determinations ... has physically inspected Hillside Drive. The road is in very poor condition, and current road conditions at the project location are already hazardous. This project will further contribute to an unacknowledged cumulative impact on public safety. This is a critical concern because Hillside Drive is the designated emergency access route for the neighborhood, and emergency vehicle access is impeded.

Hillside Drive ... between Via Siena and Soledad Road ... is an 18' wide, winding, steep road with multiple "blind" / "hairpin turns," that provides the only emergency access / egress for residents and for emergency vehicles.

JOSEPH J. MANNO and NANCY ANNE MANNO (2/13/2018)

Letter K

1. This comments introduces arguments from the author regarding the adequacy of the CEQA document. Please see below for the responses.
2. Please see Section IV a) of the Initial Study. A Brush Management Plan has been required as part of the project and would reduce potential fuel load which could potentially cause wildfires.
3. Please see response number E2. Additionally the questions in Section XVI. of the Initial Study references project features that are being introduced by projects which would cause a substantial increase in traffic hazards. The project does not contain dangerous designee features such as sharp curves or dangerous intersections. The alleged poor and unsafe road concerns being discussed in this comment are existing conditions that are not being introduced by the project.

- ④ The Project site is extremely steep and located on a sharp curve with limited sight lines. It is also adjacent to rough pavement that causes vehicles to veer out of lane, further constricting travel at the project location. We also take specific exception to: IX. HYDROLOGY AND WATER QUALITY, "the proposed residence would be adequately served by existing municipal storm water drainage facilities, therefore no impacts would occur." There is no complete storm water system on Hillside Drive and whatever system does exist is highly inadequate for existing structures. There has been no requirement for any of the new projects to contribute to the effectiveness of this antiquated and undersized system.

The above-described issues should be addressed in the MND report, analyzed and mitigated.

Sincerely,

Joseph J. Manno
Nancy Anne Manno
2329 Rue de Anne
La Jolla, CA 92037

858.459.8849
jma2jma@san.rr.com

Letter K

4. The comment raises similar issues that have been previously addressed. Please see response numbers E2, E3, E5 and E6.

LETTER L

Szymanski, Jeffrey

From: jrbenson@mac.com
Sent: Monday, February 12, 2018 12:02 PM
To: DSD EAS
Subject: Liaghat Residence Project No.503701 / SCH No. Pending

February 12, 2018

Jeff Szymanski, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501, San Diego, CA 9210

Project Name: Liaghat Residence
Project No. 503701 / SCH No. Pending * Community Plan Area: La Jolla
Council District: 1

My name is Judy Benson. I live at 7550 Hillside Drive just adjacent to the proposed Liaghat project under evaluation.

From my perspective the City and Planning Department has severely under-evaluated the impact on the safety, the environment and the neighbors of Hillside Drive between Soledad Road and Via Siena.

This sincere outcry to you is a result of my very personal experience of living with the unintended outcomes of the City permitting too many building projects without thorough consideration of the real and hazardous consequences to the neighborhood.

The following statements shall attempt to define these hazardous consequences:

- ① 1. The current construction related traffic congestion is such that a resident traveling on Hillside Drive can count on being delayed for several minutes to half an hour or longer depending upon what, in particular, is happening on one of the construction sites. This added Liaghat project will just exacerbate this current unfortunate issue.
- ② 2. The most egregious challenges have occurred directly in front of the proposed Liaghat project resulting in emergency road closures. The culprit is usually a huge oversize articulating truck getting snagged on the extraordinarily narrow blind curvature or "hairpin" turn at this particular location.
- ③ 3. The above referenced problems could pose a serious safety hazard to residents were there a health or fire emergency to occur during one of these closures.
- ④ 4. This road was never intended for such traffic as now occur on Hillside Drive. It was originally constructed by the Army Corps of Engineers to merely provide access to a lookout. The City has never addressed the growing use and abuse of this road over these many years which, ideally, would have been to create a safe and well constructed road which meets current safety and structural codes.
- ⑤ 5. The most direct and frightening personal issue for me and the safety of my home is the fact that there has been some recent subsidence on my property just south of my garage near the road. I have had a structural

JUDY BENSON (2/12/2018)

Letter L

1. The comment raises similar issues that have been previously addressed. Please see response number E2 and E3.
2. This comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.
3. The comment raises similar issues that have been previously addressed. Please see responses number 10.
4. The comment raises similar issues that have been previously addressed. Please see response number E2.
5. The comment raises similar issues that have been previously addressed. Please see response number E2, E3 and E6. Additionally, DSD Geology staff has reviewed the project and determined that the geotechnical consultant has adequately addressed the soil and geologic conditions potentially affecting the proposed project for the purposes of environmental review.

LETTER L

engineer and a soils engineer both tell me that there is subsidence and to just watch it closely by monitoring it monthly. It appears to have moved one quarter of an inch in just two months. With the advent of Mr. Liaghat moving great amounts of earth and necessarily using heavy construction equipment to create his dwelling, I am concerned this invasive action to this particularly geologically fragile canyon could cause my home serious if not permanent harm.

- ⑥ Given the fact that Hillside Drive is constrained by existing buildings, steep hillside terrain that cannot be widened nor redirected I would plead with you to at least consider a moratorium on issuing any new permits until the road can be repaired. Even though the safety and environmental issues would remain you would certainly have a very grateful Hillside Drive community on your hands.

Thank you for considering my request.

Sincerely,

Judy Benson
858-454-3842

Letter L

6. This comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.

LETTER M

Szymanski, Jeffrey

From: Barbara Scott Majure <bama@ucsd.edu>
Sent: Saturday, February 10, 2018 4:50 PM
To: DSD EAS
Subject: Light Project 503701/SCH no. Pending -- Attention Jeff Szymanski

Dear Mr. Szymanski:

- ① The building permits that have been issued on Hillside Drive should ALL be revoked or possibly reduced to 2 or less every 2 years. There are many many reasons this should happen, but the major one, as far as I'm concerned, is the enormous lawsuit that will be filed against the City of San Diego (with an equally enormous sum to be paid out) when an ER response team or a fire truck is delayed or cannot reach in a timely manner a householder (and there are preponderantly elderly householders on this street) who either dies or becomes brain-dead due to the City's non-responsive action to our problems up here. Thank God there is an enormous paper trail here to a great deal of (so-called) officials of this City complaining about this matter since last April of 2017.

Reference MND VIII. Hazards and hazardous materials. This is pure and simple hooley.

Yours - Barbara

++++
Barbara Scott Majure
7631 Hillside Drive.
La Jolla CA 92037
voice: 858-454-2326.
fax: 858-454-8250
email: bama@ucsd.edu
++++

BARBARA SCOTT MAJURE (2/10/2018)

Letter M

1. This comment does not raise specific issues related to the adequacy of the environmental analysis and no additional response is required.

LETTER N

Szymanski, Jeffrey

From: John Gilchrist <jmgilchrist@aol.com>
Sent: Saturday, February 10, 2018 9:39 AM
To: DSD EAS
Subject: Liaghat Residence Project No.503701/SCH No Pending

Dear Mr Szymanski : We have reviewed the Draft MND for the above referenced project and believe it is deficient as it relates to the Transportation/Traffic Section. The document does not address a critical issue which is the impact of construction vehicles parked on Hillside Drive and blocking of access for emergency Vehicles. Hillside is a narrow street and is posted with no parking on either side of the street to provide that access which is critical to everyone's safety and well being in the neighborhood !

Anne & John Gilchrist
7590 Hillside Drive

Sent from my iPad

ANNE AND JOHN GILCHRIST (2/10/2018)

Letter N

50. The comment raises similar issues that have been previously addressed. Please see response numbers E2, and E3.

INITIAL STUDY CHECKLIST

1. Project title/Project number: Liaghat Hillside Vacation / 503701
2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101
3. Contact person and phone number: Jeffrey Szymanski / (619) 446-5324
4. Project location: 7430 Hillside Drive, La Jolla, CA 92037
5. Project Applicant/Sponsor's name and address: Hamid Liaghat, 1469 Caminto Halago, La Jolla CA, 92037
6. General/Community Plan designation: Residential/La Jolla Community Plan
7. Zoning: Base zone RS-1-1
8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

Liaghat Hillside Vacation COASTAL DEVELOPMENT PERMIT (CDP), SITE DEVELOPMENT PERMIT (SDP), BOUNDARY LINE ADJUSTMENT (BLA) and a SEWER EASEMENT VACATION for a sewer easement vacation to allow the construction of a 7,884 square foot two story residence. The square footage includes a 3,600 upper floor, a 3,949 square foot second floor, a 790 square foot garage and 730 square feet of decks. The decks and basement are not included in the overall 7,884 square feet. The project is situated on a vacant .514 acre lot on the west side of Hillside Drive. Due to an encroachment into the Multi-Habitat Planning Area (MHPA) a Boundary Line Adjustment (BLA) is required. The proposed project is located within: Base zone RS-1-1, Coastal Height Limitation Zone, Coastal Overlay Zone (Non-Appealable 1), Brush Management Area, Parking Impact Overlay Zone (Coastal), the City's Historical Sensitivity map, and the La Jolla Community Plan.

Geotechnical investigations indicates that the upper portion of the site has been modified by grading of Hillside Drive. Evidence of soil disturbance in the upper and lower portions of the slope consists of 2 to 3 feet of fill soil and broken concrete/brick retaining walls down to approximately elevation 380 feet. In addition, significant excavation and soil disturbance was observed in the area of the existing sewer main.

In order to develop the property and to construct the residence approximately 60 percent of the site would be graded. Required grading would consist of 770 cubic yards of excavation with 780 cubic yards of fill. Due to the grading various retaining walls would be required; however, because the site slopes down and away from the street most of the retaining walls would not be visible from Hillside Drive.

The project site is bordered on the north and east by existing residential properties, on the west by partially developed land and on the south by Hillside Drive. Elevations across the

property range from approximately 302 feet above Mean Sea Level (AMSL) at the northwest corner, to 390 feet AMSL at the southeast corner. The proposed drainage would continue to follow existing conditions by draining northwest towards an existing storm drain inlet and ditch. Runoff from the buildings would be picked up by roof drains and conveyed via new storm drains.

The project has provide a Landscape Plan that has been reviewed and approved by the City's Landscaping Planning staff. The plan would include but not limited to street trees (Queen Palm) and shrubs (ceanothus and lantana amongst others). Areas of the site adjacent to the MHPA and existing sensitive habitat would comply with MHPA Land Use Adjacency Habitat Guidelines which would prohibit invasive non-native plants in these areas. As previously mentioned that due to an encroachment into the MHPA a BLA would be required, please see Section X of the Initial Study for further discussion. Additionally, a Covenant of Easement covering sensitive habitat will also be required.

9. Surrounding land uses and setting: The project site is bordered on the north and east by existing residential properties, on the west by partially developed land and on the south by Hillside Drive.

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

None required.

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

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

In accordance with the requirements of Assembly Bill (AB) 52, the City of San Diego sent notification to two Native American Tribes traditionally and culturally affiliated with the project area on August 14, 2017. Both the Iipay Nation of Santa Ysabel and the Jamul Indian Village responded within the 30-day period requesting consultation and additional information. Consultation concluded on 12/19/17 with Iipay Nation of Santa Ysabel and on Jaumul Indian Village on 1/10/18. Please see Section XVII of the Initial Study for more detail.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

The project is located on a vacant site within an urbanized residential area. The project would construct a new residential dwelling unit and also vacate a sewer easement. Construction of the project would affect the visual environment during excavation, grading, and on-site storage of equipment and materials. Although views may be altered, construction would be short term and temporary. Temporary visual impacts would include views of large construction equipment, storage areas, and potential signage. All construction equipment would vacate the project site upon completion of the project, thus making any visual obstructions temporary.

Per the City of San Diego CEQA Significance Thresholds projects that would block public views from designated open space areas, roads, or parks to significant visual landmarks or scenic vistas may result in a significant impact. The La Jolla Community Plan (LJCP) has designated this portion of Hillside Drive as a scenic overlook. However, the project site slopes downwards from Hillside Drive to the northwest away from a viewing perspective. Additionally, because the development is following the downslope grade of the site the new residence would not block any view and would not be visible from the street. Based on the siting of residence the project would not impact any views from Hillside Drive to the ocean and impacts in this category would be less than significant.

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

There are no designated scenic resources such as trees, rock outcroppings or historic buildings within a state scenic highway within the project's boundaries. Although, as mentioned above Hillside Drive has been designated as a scenic overlook in the LJCP. Views to the ocean are visible from the street but as described above views to the ocean would not be blocked.

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

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

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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cumulative effect by opening up a new area for development or changing the overall character of the area. None of the above conditions apply to the project.

The site is currently undeveloped and while it does contain areas of native vegetation the site has been previously disturbed. The newly constructed dwelling unit would be constructed to comply with all height and bulk regulations and is consistent with General Design guidelines as outlined in the LJCP. The project site is located in a developed neighborhood and existing homes in the neighborhood do not have a unifying architectural theme such as the Spanish architecture of Old Town. In addition, existing development is a mixture of one and two story homes and there is no predominance of either style. Therefore, the constructed dwelling unit would not be substantially different in architecture than the current existing homes. The project would not result in the physical loss, isolation or degradation of a community identification symbol or landmark which is identified in the General Plan, applicable community plan or local coastal program. The construction of the residence would not open up a new area for development or change the overall character of the area.

Therefore, since none of the above conditions apply, the project would not substantially degrade the existing visual character or the quality of the site and its surroundings. No impact would result due to implementation of the project.

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

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

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

The project site is classified as Urban and Built-Up land by the Farmland Mapping and Monitoring Program (FMMP). Similarly, the land surrounding the project site is not in agricultural production

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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and is not classified as farmland by the FMMP. Therefore, the proposed project would not convert farmland to non-agricultural uses. No impact would result due to implementation of the project.

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| b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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The project location is not currently zoned for agricultural use. The project is not under a Williamson Act Contract nor are there any other surrounding properties under a Williamson Act Contract. No impact would result due to implementation of the proposed project.

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

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

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

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

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

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

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

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

The San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB). The County Regional Air Quality Strategy (RAQS) was initially adopted in 1991, and is updated on a triennial basis

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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(most recently in 2009). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone (O₃). The RAQS relies on information from the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

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

The project would construct a new residence within a developed neighborhood of similar residential uses. The project is consistent with the General Plan, community plan, and the underlying zoning for residential development. Therefore, the project would be consistent at a sub-regional level with the underlying growth forecasts in the RAQS, and would not obstruct implementation of the RAQS. No impact would result due to implementation of the project.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Short-term Emissions (Construction)

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

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

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

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

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

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

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

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

Short-term (Construction)

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

Long-term (Operational)

Typical long-term operational characteristics of the project are not associated with the creation of such odors nor anticipated to generate odors affecting a substantial number of people. Residential dwelling units, in the long-term operation, are not typically associated with the creation of such odors nor are they anticipated to generate odors affecting a substantial number or people. Therefore, project operations would result in less than significant impacts.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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IV. BIOLOGICAL RESOURCES – Would the project:

- a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- ☐
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The site is currently vacant and contains some remnant areas of native sensitive habitat. Therefore, a biological survey report (Pacific Southwest Biological Services, Inc., January 12, 2018) was prepared to assess potential impacts from the project to biological resources. The biological assessment included: vegetation mapping, and a general plant and wildlife survey. The biological survey report is available for review at the offices of the City of San Diego Development Services Department. Due to the fact that the project would require a BLA Pacific Southwest Biological Services also prepared a BLA report which will be discussed further in Section X.

The biologist first surveyed the site in 2014 and subsequent surveys in May and December of 2015, and again in October of 2016.

Date	Personnel	Survey Type	Time	Conditions
12/24/15	Beauchamp	General Biological Assessment	1000-1110	63°F. Skies cloudy. Winds calm to 1-3 mph W.
5/8/16	Beauchamp	Avian Survey	0800-0900	65°F, overcast, calm
5/13/16	Beauchamp	General Biological	1030-1130	74°F clear skies, winds calm to 3 mph from west
10/16/16	Beauchamp	General Biological	1000-1115	76°F clear skies, winds calm

The survey determined that the upper eastern portion of the site is dominated by a stand of Giant Cane (*Arundo donax*) and Century Plant (*Agave americana*). In addition, planted Iron Bark Eucalyptus (*Eucalyptus sideroxylon*) trees occur with Ivy (*Hedera helix*) and Oleander (*Nerium oleander*) and a narrow remnant of native vegetation persists on the western side of the site, Diegan Coastal Sage Scrub elements of Flat-top Buckwheat (*Erigonum fasciculatum*) and Coastal Sage (*Artemisia californica*). Further down the western slope as well as off-site to the south is a dominant cover of Lemonade berry (*Rhus integrifolia*) and few Toyons (*Heteromeles arbutifolia*). No rare, threatened, endangered, endemic and or sensitive plant or animal species were observed.

Existing Vegetation

Urban Developed	0.3ac (13,089sqft)
Disturbed	0.011ac (489sqft)
Diegan Coastal Sage Scrub	0.046ac (1,993sqft)
DCSS- Rhus phase	.156ac (6,825sqft)

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Development of project site would involve impacts to intact native, vegetation from down slope brush management actions. In addition to the eucalyptus trees, fuel loading on the slope has reached a stage where any conflagration would be supported, so brush modification is recommended, especially removal of the eucalyptus trees and reducing native shrub density. Construction of the proposed residence and associated brush management actions will have an adverse impact to biological resources since the impact exceeds 0.1 acre of sensitive ESL vegetation. Development of the site (including the project footprint and Brush Management Zone 1) would impact .308 acre of Diegan Coastal Sage Scrub . This vegetation is considered a Tier II habitat. There is an additional impact to 0.156 acre of Diegan Coastal Sage Scrub that occur within Brush Management Zone (BMZ) 2. Impacts within BMZ 2 are impact neutral and would not require mitigation. Impacts to Tier II habitat would be mitigated through a payment into the City's Habitat Acquisition Fund (HAF) as shown below.

Vegetation Type	Acreage impact outside the MHPA	Required Mitigation within the MHPA (1:1) (HAF Payment)
Tier II, Diegan Coastal Sage Scrub	.308 acres	.308 acres

Due the project's proximity to sensitive habitat there would be chance that grading and construction activities could inadvertently impact sensitive resources; therefore, biological monitoring would be required to observe construction adjacent to sensitive habitat. The following mitigation measures would reduce impacts to biological resources to below a level of significance.

BIO-1 DIRECT HABITAT MITIGATION REQUIREMENTS

Payment for 0.308 acre to the City's Habitat Acquisition Fund is required as follows:
1:1 mitigation ratio for 0.308 acre of Tier II impact outside MHPA with mitigation within the MHPA.

BIO-2 BIOLOGICAL RESOURCE PROTECTION DURING CONSTRUCTION

Section V; the Mitigation, Monitoring, and Reporting Program; of the MND includes the mitigation measures in full and would ensure that impacts to biological resources would be less than significant.

- b) Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project site does not contain any riparian habitat or identified sensitive community. No impact would result due to implementation of the project.

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

There are no federally protected wetlands on site. Therefore, construction activities would not cause an impact to wetlands as defined by Section 404 of the Clean Water Act. There would be no impacts to federally protected wetlands. No impact would result due to implementation of the project.

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

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features, such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife movement corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas and facilitate the exchange of genetic traits between populations. Use of the site as a corridor is not considered probable due to the setting of the site and adjacent residences.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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As discussed previously, the project is mapped as having an MHPA overlay and a BLA would be required. Please see section X for further discussion.

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

As discussed previously, the project is mapped as having an MHPA overlay and a BLA would be required. Please see section X for further discussion.

V. CULTURAL RESOURCES – Would the project:

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. Before approving discretionary projects, CEQA requires the Lead Agency to identify and examine the significant adverse environmental effects which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

Archaeological Resources

Many areas of San Diego County, including mesas and the coast, are known for intense and diverse prehistoric occupation and important archaeological resources. The region has been inhabited by various cultural groups spanning 10,000 years or more. The project site is located on the City of San Diego's Historical Resources Sensitivity map. Furthermore, the project site is located within an area of La Jolla Shores that requires special considerations due to the area's archaeological sensitivity with respect to the Spindrift archaeological site and the high potential for project grading to impact unknown prehistoric resources including human remains.

A record search of the California Historic Resources Information System (CHRIS) digital database was reviewed by qualified archaeological City staff to determine presence or absence of potential resources within the project site. Although no recorded archaeological sites were located within or adjacent to the project site due to fact that the project site was vacant an archaeological survey was required (Brian Smith and Associates, June 2017). The archaeological consultants conducted a survey as well as another record search of the project site. The record search was negative and the survey did not result in the discovery of any artifacts, cultural ecofacts, or other material related to prehistoric or historic land use within the project boundaries. Based upon the negative survey and record search, the steep slopes, and the extensive disturbed nature of the project site impacts to archaeological resources would not occur.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Please refer to response V.a.

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

The geological Point Loma formation underlies the project site. This is a sensitive formation and according to the City's Threshold, projects that would excavate over 1,000 cubic yards of soil reaching depths of 10' or more would result in a significant impact to paleontological resources. The project would require the excavation of 770 cubic yards of soil and therefore would not exceed the

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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threshold for paleontological resources. The project would not destroy a paleontological resource or geologic feature and mitigation would not be required.

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

The proposed project site is not currently used as a cemetery and is not otherwise known to contain human remains. Additional as discussed in V (a) archaeological prehistoric resources were not identified and impacts in this category would not occur.

VI. GEOLOGY AND SOILS – Would the project:

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

A preliminary geotechnical investigation (Geotechnical Exploration, Inc., April 2017) was prepared for the project and was approved by City Geology staff. The scope of work for the investigation included a review of available published information pertaining to the site geology, a site reconnaissance and a subsurface exploration program. Although the Rose Canyon Fault Zone is located ¼ mile southwest of the site, no active fault or potentially active fault underlies the site. Therefore, risks from rupture of a known earthquake fault would not be significant.

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

Ground shaking from major active fault zones could affect the site in the event of an earthquake. However, per the submitted approved geotechnical investigation as described above, there are no known faults on the project site and impacts would not be significant.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Liquefaction occurs when loose, unconsolidated, water-laden soils are subject to shaking, causing the soils to lose cohesion. The geotechnical report indicates that the location and geotechnical conditions at the site are not conducive to any of these phenomena. No impact would result due to implementation of the project.

- | | | | | |
|-----------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Per the approved geotechnical report landslides have not been mapped as being present, both on or immediately adjacent to the site. Furthermore the project site is not mapped in a landslide zone. No impact would result due to implementation of the project.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project includes a landscape plan that has been reviewed and approved by City staff. Implementation of the approved plan would preclude the erosion of any topsoil. In addition, standard construction BMPs would be in place to ensure that the project would not result in a substantial amount of topsoil erosion. No impact would result due to implementation of the project.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Please see Vairi, proper engineering design and utilization of standard construction practices would be verified at the construction permitting stage and would ensure that impacts in this category would not occur. No impact would result due to implementation of the project.

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

The project is not located on expansive soil. No impact would result due to implementation of the project.

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

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

VII. GREENHOUSE GAS EMISSIONS – Would the project:

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

On July 12, 2016, the City of San Diego adopted the Climate Action Plan (CAP) Consistency Checklist, which requires all projects subject to discretionary review to demonstrate consistency with the

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Climate Action Plan. For project-level environmental documents, significance of greenhouse gas emissions is determined through the CAP Consistency Checklist.

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

The project is consistent with the existing General Plan and Community Plan land use and zoning designations. Further based upon review and evaluation of the completed CAP Consistency Check for the project, the project is consistent with the applicable strategies and actions of the CAP. Therefore, the project is consistent with the assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets, and impacts from greenhouse gas emissions are considered less than significant. No mitigation is required.

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

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

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

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

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

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

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

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
hazardous materials into the environment?				

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

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

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

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

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

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

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

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

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

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

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project is not located within the boundaries of an existing airport land use plan or an airport land use plan pending adoption. The project is not located within the flight path of any airport and would not introduce any new features that would create a flight hazard. No impact would result due to implementation of the project.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

This project is located in a developed neighborhood with no private airstrip located in the immediate vicinity. No impact would result due to implementation of the project.

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

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

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

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

IX. HYDROLOGY AND WATER QUALITY - Would the project:

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

The project was reviewed and approved by City Engineering staff. The project was reviewed for all applicable water quality standards and water discharge requirements. In addition, all runoff would be routed to the existing City of San Diego public conveyance system (curb and gutters). Compliance with the City of San Diego's Storm Water Standards would ensure that water quality impacts would not occur and mitigation is not required.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Proper landscaping would prevent substantial erosion onsite. No stream or river is located on or adjacent to the site, all runoff would be routed to the existing storm drain system, and would therefore not substantially alter existing drainage patterns. No impact would result due to implementation of the project.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Please see IX.c., no flooding would occur. No impact would result due to implementation of the project.

e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Based on City of San Diego review, the proposed residence would be adequately served by existing municipal storm water drainage facilities, therefore no impacts would occur. Potential release of sediment or other pollutants into surface water drainages downstream from the site will be precluded by implementation of Best Management Practices (BMPs) required by City of San Diego regulations, in compliance with San Diego Regional Water Quality Control Board requirements to implement the federal Clean Water Act. Therefore, no significant surface water quality impacts are expected to result from the proposed activity. Proper irrigation and landscaping would ensure that runoff would be controlled and unpolluted. No impact would result due to implementation of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project does not propose construction of any new housing in the 100 year flood hazard area and impacts in this category would not occur. No impact would result due to implementation of the project.

h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project does not propose construction of any features that would impede or redirect flows. No impact would result due to implementation of the project.

X. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project is consistent with the General Plan's and LJCPL land use designation and with surrounding land uses. The project site is located within a developed residential neighborhood and surrounded by similar residential development. The project would construct a new residential dwelling unit and vacate a sewer easement and would not affect adjacent properties. Therefore, the project would not physically divide an established community. No impact would result due to implementation of the project.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See response X(a) above. Additionally the following discretionary permits would be required : pursuant to SDMC 126.0702, the proposed development shall require a Coastal Development Permit (CDP) and pursuant to SDMC 143.0110(b) Table 143-01A, which applies to the Environmentally Sensitive Lands Regulations, the proposed development shall require a Site Development Permit (SDP). As previously discussed the project is compatible with the area designated for residential development by the General Plan and Community Plan, and is consistent with the existing underlying zone and surrounding land uses. Construction of the project would occur within an urbanized neighborhood with similar development. The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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(including but not limited to the general plan community plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. No impact would result due to implementation of the project.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The site is partially located within the City MSCP, MHPA. The eastern portion of the site where the development would occur is the least biologically sensitive portion of the parcel. The site has an existing public sewer line bisecting the site from the southeast to northwest that will be relocated to the southern and western property lines. The western portion of the sewer line will be within the existing and proposed MHPA. Because the project would encroach into the MHPA a BLA to the MHPA was necessary. The BLA is a component of the proposed project and would have to be formally approved by the City. Pacific Southwest Biological Services, Inc., (December 1, 2017) prepared a BLA report and the results are summarized below.

Total area of parcel =22,396. *Square feet*, 0.514 acre, 100%
Existing Area outside MHPA =6,326 *square feet*, 0.145 acre, 28%
Existing area within MHPA = 16,070 *sq ft*, 0.369 acre, 72%

Allowed MHPA encroachment for a site 100% encumbered by MHPA would be 30%
(25% allowed for residence and 5% for public utility)

As the site already is 28% outside the MHPA, an additional 2% encroachment would be allowed into the MHPA without a BLA

In this case, the applicant is proposing to increase the area outside the MHPA to 0.22acre, or 43%
(Area outside the MHPA includes most of the southern public sewer leg)

The proposed BLA is therefore based on 43% proposed additional encroachment
+ 28% already outside the MHPA to be developed -30% allowed encroachment for a site 100% encumbered = 41% or 0.06314 acre BLA is proposed.

A BLA must include equivalent or greater compensation, i.e. land removed must be replaced by equal or greater habitat value/acreage. In addition, if payment into the City's Habitat Acquisition Fund (HAF) is desired for the BLA compensation, it must be 4:1 or greater to compensate for the inherent 25% development allotted for each acre purchased. The proposed BLA would make the MHPA whole by paying into the HAF an amount based on 4 times the encroachment of 0.06314 acre. As depicted in the Table below.

Or;

The required amount at the time permits are pulled. This payment will be in addition to compensation required for direct biological impacts on-site from the construction of the residential development and the public sewer line and easement (please note a portion of the sewer line will remain in the MHPA as a public utility –compatible use).

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The above requirements are not mitigation measures but have been agreed upon within the BLA plan and would become a requirement of the discretionary permit. The BLA proposal was reviewed and approved by the Wildlife Agencies and would be formally adopted with the certification of this environmental document and no conflicts would occur to any conservation plans.

Summary of Functional Equivalency Analysis for the Liaghat Residence Project

<u>Habitat/Tier</u>	<u>Acres On-Site</u>	<u>Existing MHPA On-Site</u>	<u>Proposed MHPA On-Site</u>	<u>Proposed MHPA Removal On-Site</u>	<u>Allowed MHPA Encroachment On-Site</u>	<u>Proposed MHPA "Give" (off-site)</u>	<u>Overall Net Gain for MHPA</u>
<u>Disturbed Coastal Sage Scrub/ Tier II</u>	<u>0.514 ac</u> <u>100%</u>	<u>0.369 ac</u> <u>72%</u>	<u>0.145 ac</u> <u>28%</u>	<u>0.22 ac</u> <u>43%</u>	<u>0.1542</u> <u>30% (25% standard + 5% for public utility-sewer serving more than one home)</u>	<u>4:1 in HAF for a 0.06314 ac or 41% BLA = 0.25256 ac of credits to be purchased in HAF + 10% admin fee *</u>	<u>0.18942 ac</u> <u>(based on 0.25256 ac give - 0.06314 take area)</u>
<u>Total Site</u>	<u>0.514 ac</u>	<u>0.369</u>	<u>0.145ac</u>	<u>0.22ac</u>	<u>0.1542 ac</u>	<u>0.25256 ac</u>	<u>0.18942</u>

The proposed BLA is based on 43% proposed additional encroachment in the MHPA + 28% already outside the MHPA to be developed -30% maximum allowed encroachment for the site for a **41% or 0.06314 acre of MHPA to be removed from the site.**

Additionally, due the project's adjacency to the MHPA the following Land Use Adjacency Guidelines will also become conditions of the permit:

MSCP SUBAREA PLAN -LAND USE ADJACENCY GUIDELINES

- I. Prior to issuance of any construction permit or notice to proceed, DSD/ LDR, and/or MSCP staff shall verify the Applicant has accurately represented the project's design in or on the Construction Documents (CD's/CD's consist of Construction Plan Sets for Private Projects and Contract Specifications for Public Projects) are in conformance with the associated discretionary permit conditions and Exhibit "A", and also the City's Multi-Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines. The applicant shall provide an implementing plan and include references on/in CD's of the following:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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A. Grading/Land Development/MHPA Boundaries

MHPA boundaries on-site and adjacent properties shall be delineated on the CDs. DSD Planning and/or MSCP staff shall ensure that all grading is included within the development footprint, specifically manufactured slopes, disturbance, and development within or adjacent to the MHPA. For projects within or adjacent to the MHPA, all manufactured slopes associated with site development shall be included within the development footprint.

B. Drainage

All new and proposed parking lots and developed areas in and adjacent to the MHPA shall be designed so they do not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials prior to release by incorporating the use of filtration devices, planted swales and/or planted detention/desiltation basins, or other approved permanent methods that are designed to minimize negative impacts, such as excessive water and toxins into the ecosystems of the MHPA.

C. Toxics/Project Staging Areas/Equipment Storage

Projects that use chemicals or generate by-products such as pesticides, herbicides, and animal waste, and other substances that are potentially toxic or impactive to native habitats/flora/fauna (including water) shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. No trash, oil, parking, or other construction/development-related material/activities shall be allowed outside any approved construction limits. Where applicable, this requirement shall be incorporated into leases on publicly-owned property when applications for renewal occur. Provide a note in/on the CD's that states: *"All construction related activity that may have potential for leakage or intrusion shall be monitored by the Qualified Biologist/Owners Representative or Resident Engineer to ensure there is no impact to the MHPA."*

D. Lighting

Lighting within or adjacent to the MHPA shall be directed away/shielded from the MHPA and be subject to City Outdoor Lighting Regulations per LDC Section 142.0740.

E. Barriers

New development within or adjacent to the MHPA shall be required to provide barriers (e.g., non-invasive vegetation; rocks/boulders; 6-foot high, vinyl-coated chain link or equivalent fences/walls; and/or signage) along the MHPA boundaries to direct public access to appropriate locations, reduce domestic animal predation, protect wildlife in the preserve, and provide adequate noise reduction where needed.

F. Invasives

No invasive non-native plant species shall be introduced into areas within or adjacent to the MHPA.

G. Brush Management

New development adjacent to the MHPA shall be set back from the MHPA to provide required Brush Management Zone 1 area on the building pad outside of the MHPA. Zone 2 may be located within the MHPA provided the Zone 2 management will be the responsibility of an HOA or other private entity except where narrow wildlife corridors require it to be located outside of the MHPA. Brush management zones will not be greater in size than currently required by the City's regulations, the amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done and vegetation clearing shall be prohibited within native coastal sage scrub and chaparral habitats from March 1-August 15 except where the City ADD/MMC has

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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documented the thinning would be consist with the City's MSCP Subarea Plan. Existing and approved projects are subject to current requirements of Municipal Code Section 142.0412.

H. Noise

Due to the site's location adjacent to or within the MHPA where the Qualified Biologist has identified potential nesting habitat for listed avian species, construction noise that exceeds the maximum levels allowed shall be avoided during the breeding seasons for the following: California Gnatcatcher (3/1-8/15). If construction is proposed during the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys shall be required in order to determine species presence/absence. If protocol surveys are not conducted in suitable habitat during the breeding season for the aforementioned listed species, presence shall be assumed with implementation of noise attenuation and biological monitoring.

XI. MINERAL RESOURCES – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

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

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

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

XII. NOISE – Would the project result in:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Construction related noise would result, but would be temporary and is strictly regulated under San Diego Municipal Code Section 59.5.0404, "Noise Abatement and Control" which places limits on the hours of construction operations and standard decibels which cannot be exceeded. Therefore, people would not be exposed to noise levels in excess of those covered by existing noise regulations. No impact would result due to implementation of the project.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Generation of, excessive ground borne vibration or ground borne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

No excessive noise is anticipated as a result of the new construction. Therefore no ground vibration would result. No impact would result due to implementation of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

See XII the project once complete would not result in any permanent noise increase. No impact would result due to implementation of the project.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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As stated above there would be a temporary increase in noise during demolition of the existing structure and with new construction of the proposed project; however, work would only be allowed between the hours of 7 am and 7 pm in compliance with the City of San Diego's noise ordinance for construction activities. After construction is completed, no substantial increase in noise levels would result from this dwelling unit. No impact would result due to implementation of the project.

e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project is not located within an airport land use plan or within any noise contours of such a plan. Therefore, residents of the new building would not be exposed to excessive noise levels from a public airport. No impact would result due to implementation of the project.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project is not located within the vicinity of a private airstrip; therefore, people residing or working in the area of the project would not be exposed to excessive airport noise. No impact would result due to implementation of the project.

XIII. POPULATION AND HOUSING – Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would construct one new residential unit; therefore, one residential unit would not result in a substantial increase in units of residential housing. No impact would result due to implementation of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No displacement would occur as a result of this project. The project would construct a new residential dwelling unit and would not displace existing housing. No impact would result due to implementation of the project.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See XIII. No impact would result due to implementation of the project.

XIV. PUBLIC SERVICES

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

i) Fire protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The City of San Diego Fire-Rescue Department (SDFD) encompasses all fire, emergency medical, lifeguard and emergency management services. SDFD serves 331 square miles, including the project site, and serves a population of 1,337,000. SDFD has 801 uniformed fire personnel and 48 fire stations available to service the project site.

The project would construct one residential unit and would not require the alteration of any fire protection facilities and would not require any new or altered fire protection services. No impact would result due to implementation of the project.

ii) Police protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The City of San Diego Police Department (SDPD) would serve the proposed project. The project site is located within the SDPD's Northern Division, which serves a population of 225,234 people and encompasses 41.3 square miles. The project is constructing one unit and would not require the alteration of any fire protection facilities and would not require any new or altered police protection services. No impact would occur.

iii) Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would not physically alter any schools. Additionally, the project would not include construction of future housing or induce growth that could increase demand for schools in the area. No impact would result due to implementation of the project.

iv) Parks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would not induce growth that would require substantial alteration to an existing park or the construction of a new park does not have a population-based park requirement. No impact would result due to implementation of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
v) Other public facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

XV. RECREATION

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

This project would construct one new residential dwelling unit. The project would not require any expansion of existing recreational facilities. There would be no increase in the use of existing facilities in the area including parks or other recreational areas. No impact would result due to implementation of the project.

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

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

XVI. TRANSPORTATION/TRAFFIC – Would the project?

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

Since the proposed project would construct one new residential dwelling unit, traffic patterns would not substantially change. The new dwelling unit would not change road patterns or congestion. In addition the project would not require the redesign of streets, traffic signals, stop signs, striping or any other changes to the existing roadways or existing public transportation routes or types are necessary. No impact would result due to implementation of the project.

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

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

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project is located in a residential community outside of airport land use plan areas. The project is consistent with height and bulk regulations and is not at the scale which would result in a change in air traffic patterns. No impact would result due to implementation of the project.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See XVI a. No impact would result due to implementation of the project.

e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See XVI a. No impact would result due to implementation of the project.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would not alter the existing conditions of the project site or adjacent facilities with regard to alternative transportation. Construction of the project would not result in design measures or circulation features that would conflict with existing policies, plan, or programs supporting alternative transportation. No impact would result due to implementation of the project.

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

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project site is not listed nor is it 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). In addition, please see section V(a) above. No impact would result due to implementation of the project.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

In accordance with the requirements of Assembly Bill (AB) 52, the City of San Diego sent notification to two Native American Tribes traditionally and culturally affiliated with the project area on August 14, 2017. Both the Iipay Nation of Santa Ysabel and the Jamul Indian Village responded within the 30-day period requesting consultation and additional information. Consultation concluded on 12/19/17 with Iipay Nation of Santa Ysabel and on Jaumul Indian Village on 1/10/18. It was determined that there are no sites, features, places or cultural landscapes that would be substantially adversely impacted by the proposed project. The Iipay Nation of Santa Ysabel and the Jamul Indian Village both identified no further evaluation was required and concluded consultation.

XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

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

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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This project would not result in an increase in the intensity of the use and would not be required to construct a new water or wastewater treatment facility. No impact would result due to implementation of the project.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not exceed the capacity of the existing storm water drainage systems and therefore, would not require construction of new or expansion of existing storm water drainage facilities of which could cause significant environmental effects. The project was reviewed by qualified City staff who determined that the existing facilities are adequately sized to accommodate the proposed development. No impact would result due to implementation of the project.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project does not meet the CEQA significance threshold which would require the preparation of a water supply assessment. The existing project site currently receives water service from the City, and adequate services are available to serve the proposed residential dwelling units without required new or expanded entitlements. No impact would result due to implementation of the project.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Construction of the project would not adversely affect existing wastewater treatment services. Adequate services are available to serve the project site without required new or expanded entitlements. Impacts would be less than significant, and no mitigation measures are required. No impact would result due to implementation of the project.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

While construction debris and waste would be generated from the construction of the new residence it would not rise to the level of significance for cumulative (construction, demolition, and or renovation of 40,000 square feet) or direct (construction, demolition, or renovation of 1,000,000 square feet) impacts as defined by the City's Thresholds. All construction waste from the project site would be transported to an appropriate facility, which would have adequate capacity to accept the limited amount of waste that would be generated by the project. Long-term operation of the proposed residential unity is anticipated to generate typical amounts of solid waste associated with residential use. Furthermore, the project would be required to comply with the City's Municipal Code

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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for diversion of both construction waste during the demolition phase and solid waste during the long-term, operational phase. No impact would result due to implementation of the project.

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

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

XIX. MANDATORY FINDINGS OF SIGNIFICANCE –

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

The project would result in direct impacts to Biological Resources. However, implementation of the MMRP in section IV of the MND would reduce direct and/or potential impacts to these resources to below a level of significance and would not result in degradation to the environment.

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|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| b) Does the project have impacts that are individually limited but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

The project would result in impacts to Biological Resources. Mitigation for these impacts have been incorporated and no net loss of these resources would occur. The impacts associated with this project combined with other closely related past, present, and reasonably foreseeable future projects would not result in a considerable incremental contribution to any cumulative impact.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The City of San Diego conducted an Initial Study which determined that the project could have a significant environmental effect in the following area: Biological Resources. However, with the implementation of mitigation identified in Section V of this MND the project would not have environmental effects which would cause substantial direct or indirect adverse effects on human beings.

INITIAL STUDY CHECKLIST

REFERENCES

I. Aesthetics / Neighborhood Character

- ☒ City of San Diego General Plan
- ☒ Community Plans: La Jolla Community Plan

II. Agricultural Resources & Forest Resources

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

III. Air Quality

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

IV. Biology

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

- ☒ Site Specific Report: Biological Technical Report Liaghat Residence (Pacific Southwest Biological Services, Inc., January 2018) and Multi-Habitat Planning Area Boundary Line Adjustment Liaghat Residence (Pacific Southwest Biological Services, Inc., December 2017).

V. Cultural Resources (includes Historical Resources)

- ☒ City of San Diego Historical Resources Guidelines
- ☐ City of San Diego Archaeology Library
- ☐ Historical Resources Board List
- ☐ Community Historical Survey:
- ☒ Site Specific Report: Archaeological Survey of the Liaghat Residence (Brian Smith and Associates, June 2017)

VI. Geology/Soils

- ☒ City of San Diego Seismic Safety Study
- ☐ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975
- ☒ Site Specific Report: Report of Preliminary Geotechnical Investigation, Liaghat Residence (Geotechnical Exploration, Inc., April 2017)

VII. Greenhouse Gas Emissions

- ☐ Site Specific Report: CAP Checklist

VIII. Hazards and Hazardous Materials

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

IX. Hydrology/Water Quality

- ☐ Flood Insurance Rate Map (FIRM)

☒ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map

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

X. Land Use and Planning

☒ City of San Diego General Plan

☒ Community Plan

☐ Airport Land Use Compatibility Plan

☒ City of San Diego Zoning Maps

☐ FAA Determination

☐ Other Plans:

XI. Mineral Resources

☐ California Department of Conservation - Division of Mines and Geology, Mineral Land Classification

☐ Division of Mines and Geology, Special Report 153 - Significant Resources Maps

☐ Site Specific Report:

XII. Noise

☒ City of San Diego General Plan

☐ Community Plan

☐ San Diego International Airport - Lindbergh Field CNEL Maps

☐ Brown Field Airport Master Plan CNEL Maps

☐ Montgomery Field CNEL Maps

☐ San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes

☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG

☐ Site Specific Report:

XIII. Paleontological Resources

- ☒ City of San Diego Paleontological Guidelines
- ☐ Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996
- ☒ Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," *California Division of Mines and Geology Bulletin* 200, Sacramento, 1975
- ☐ Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977
- ☐ Site Specific Report:

XIV. Population / Housing

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

XV. Public Services

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

XVI. Recreational Resources

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

XVII. Transportation / Circulation

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

XVIII. Utilities

- ___ Site Specific Report:

XIX. Water Conservation

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