MITIGATED NEGATIVE DECLARATION

THE CITY OF SAN DIEGO

Project No. 453373
SCH No. 2016121067

SUBJECT: **FRIARS ROAD RESIDENTIAL MIXED USE:** VESTING TENTATIVE MAP, a SITE DEVELOPMENT PERMIT, a NEIGHBORHOOD DEVELOPMENT PERMIT, and a PLANNED DEVELOPMENT PERMIT to amend Planned Commercial Development Permit No. 87-0232 to allow for the demolition of two 3-story buildings and one 2-story building, totaling approximately 48,180 square feet and associated paved parking areas, driveways, and walkways. Subsequent construction would entail two mixed-use buildings with 313 (243 apartments and 70 condominiums) multi-family units with commercial space on the ground level consisting of 6 commercial shopkeeper units, over 2 stories of podium parking. The 243 apartments would be provided in a 103.6-foot-tall, 8-story structure. The ground floor of the apartment building would include 6 commercial shopkeeper units. The 70 condominium units would be provided in a 9-story, 124.2-foot-tall structure. Additionally, the project would include approximately 63,585 square feet of open space with private usable open space (e.g., balconies) and common areas including a fitness center, recreation rooms, pools, and a lobby for each structure. An approximate 5,361-square-foot roof deck would be provided on the roof of the condominium structure. The project would also construct various site improvements, including associated hardscape, landscaping, retaining walls, infrastructure (e.g. water, sewer), and access. The Neighborhood Development Permit is required for encroachment of the public access stairs and elevator tower into the public right of way. Deviations are being requested pertaining to front yard setback, back yard setback, retaining wall height, structure height, floor area ratio, and ground floor residential. The project would conform to Council Policy 900-14 criteria by committing to achieve a Leadership in Energy and Environmental Design (LEED) Silver Level Certification, in conformance with the criteria of the Affordable/In-Fill Housing and Sustainable Buildings Expedite Program. The 5.43-acre project site is located at 6950, 7020, and 7050 Friars Road. The lots are within the designated Office-Commercial Office at a Medium High Density (30-43 dwelling units per acre [du/acre]) and within the Friars Road Neighborhood per the Linda Vista Community Plan area. The lots are zoned CO-1-2 (Commercial Office) as well as the following overlay zones: the Very High Fire Hazard zone, Development Intensity District C (DID C), Airport Influence Area (Review Area 2) for Montgomery Field, Airport Land Use Compatibility Overlay Zone for Montgomery Field, and the Federal Aviation Administration Part 77 Noticing Area for Montgomery Field and San Diego International Airport. (LEGAL DESCRIPTION: Parcel 1 – Lots 1, 2, and 3 of Fashion Valley North, Map No. 9032). APPLICANT: Guardian Investment CAP LLC ~~Jeffrey Holbrook, LCG Friars LLC~~.

UPDATE: **March 20, 2017. Revisions and/or minor corrections have been made to this document when compared to the draft Mitigated Negative Declaration. More specifically, typographical errors and clarifications where made to the final environmental document. In accordance with the California Environmental Quality Act, Section 15073.5(c)(4), the addition of new information that clarifies, amplifies, or makes insignificant modifications 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 the identification of new significant environmental impacts or the addition of a new mitigation measure required to avoid a significant environmental impact. The modifications within the environmental document do not affect the environmental analysis or conclusions of the Mitigated Negative Declaration. All revisions are shown in a ~~strikethrough~~ and/or underline format.**

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** and **Paleontological 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.

V. MITIGATION, MONITORING AND REPORTING PROGRAM:

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/information/standtemp.shtml

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

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

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

1. **PRE-CONSTRUCTION MEETING IS REQUIRED 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: Qualified Biologist Qualified and Paleontological 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 at (858) 627-3200.**
   b) For Clarification of ENVIRONMENTAL REQUIREMENTS, applicant is also required to call **RE and MMC at (858) 627-3360.**

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) Number 453373 and/or Environmental Document Number 453373, 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 DSD Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST		
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Biology	Biologist Limit of Work Verification	Limit of Work Inspection
Paleontology	Paleontology Reports	Paleontology Site Observation
Waste Management	Waste Management Reports	Waste Management Inspections
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Biological Resources (Habitat Acquisition Fund)

Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the owner/permittee shall make payment to the City of San Diego Habitat Acquisition Fund (HAF) to mitigate for the loss of 0.92 acre of Diegan coastal sage scrub (includes disturbed Diegan coastal sage scrub) (Tier II). This fee is based on mitigation ratios, per the City of San Diego Biology Guidelines, of 1:1 ratio if mitigation would occur inside of the Multi-habitat Planning Area (MHPA) and a 1.5:1 ratio should mitigation occur outside of the MHPA. Therefore, the resulting total mitigation required for direct project impacts to Diegan coastal sage scrub (including disturbed Diegan coastal sage scrub) would be 0.92 acre inside the MHPA or 1.38 acres acres outside the MHPA) equivalent contribution to the City's Habitat Acquisition Fund (HAF) plus a 10 percent administrative fee.

BIOLOGICAL RESOURCES (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 land (ESL) Ordinance, 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 U.S. Fish and Wildlife Service [USFWS] protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

E. **Resource Delineation:** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

F. **Education:** Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

A. **Monitoring:** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar

damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the 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 on-site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

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

BIOLOGICAL RESOURCES (COOPER' S HAWK)

To avoid impacts to Cooper's Hawk**,** removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of Cooper's Hawk on the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to City DSD for review and approval prior to initiating any construction activities.

If Cooper's Hawk are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e. appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. If Cooper Hawk is present, a 300-foot avoidance buffer shall be established around an active nest within the MHPA consistent with the City MSCP Subarea Plan and the Biology Guidelines (2012). The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in

the report or mitigation plan are in place prior to and/or during construction. If Cooper's Hawk are not detected during the preconstruction survey, no further mitigation is required.

PALEONTOLOGICAL RESOURCES

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans, but prior to the first precon meeting, whichever is applicable, the ADD Environmental designee shall verify that the requirements for paleontological monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD

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

II. Prior to Start of Construction

A. Verification of Records Search

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

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a precon meeting that shall include the PI, CM, and/or Grading Contractor, RE, BI, if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related precon meetings to make comments and/or suggestions concerning the paleontological monitoring program with the CM and/or Grading Contractor.

a. If the PI is unable to attend the precon meeting, the Applicant shall schedule a focused precon meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored - Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

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

III. During Construction

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

1. The monitor shall be present full time during grading/excavation/ trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The CM is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.

2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

3. The monitor shall document field activity via the CSVR. The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. *Discovery Notification Process*

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. *Determination of Significance*

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

IV. Night and/or Weekend Work

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

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.

2. The following procedures shall be followed.
    a. No Discoveries - In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 A.M. on the next business day.
    b. Discoveries - All discoveries shall be processed and documented using the existing procedures detailed in Section III - During Construction.
    c. Potentially Significant Discoveries - If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.
    d. The PI shall immediately contact MMC, or by 8 A.M. on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction
    1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
    2. The RE, or BI, as appropriate, shall notify MMC immediately.

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

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the paleontological monitoring program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
    a. For significant paleontological resources encountered during monitoring, the paleontological recovery program shall be included in the Draft Monitoring Report.
    b. Recording Sites with the San Diego Natural History Museum - The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the paleontological monitoring program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. *Handling of Fossil Remains*

1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

C. *Curation of fossil remains: Deed of Gift and Acceptance Verification*

1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. *Final Monitoring Report(s)*

1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

VI. PUBLIC REVIEW DISTRIBUTION:

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

FEDERAL
U.S. Fish & Wildlife Service (23)

STATE
Caltrans, District 11 (31)
California Department of Fish & Wildlife (32)
State Clearinghouse (46A)

CITY

Mayor's Office (91)
Councilmember Bry, District 1 (MS 10A)
Councilmember Zapf, District 2 (MS 10A)
Councilmember Ward, District 3 (MS 10A)
Councilmember Cole, District 4 (MS 10A)
Councilmember Kersey, District 5 (MS 10A)
Councilmember Cate, District 6 (MS 10A)
Councilmember Sherman, District 7 (MS 10A)
Councilmember Alvarez, District 8 (MS 10A)
Councilmember Gomez, District 9 (MS 10A)
Development Services Department
- EAS – E. Shearer-Nguyen
- Transportation – I Elhamad
- Engineering – J Canning
- Geology – P Thomas
- Landscaping – V. Koakura
- Planning Review – M Barreras
- Project Manager – J Peterson

Planning Department
- Park and Recreation
- Plan-Airport
- Plan-Facilities Financing
- Plan-Long Range Planning

Transportation Development - DSD (78)
Development Coordination (78A)
Fire and Life Safety Services (79)
Library Department - Government Documents (81)
Central Library (81A)
Linda Vista Branch Library (81M)
Mission Valley Branch Library (81R)
Historical Resources Board (87)
Environmental Services (93A)
City Attorney (93C)

OTHER GROUPS, ORGANIZATIONS AND INTERESTED INDIVIDUALS

San Diego Association of Governments (108)
Metropolitan Transit System (112)
Metropolitan Transit System (115)
San Diego Unified School District (125)
Sierra Club (165)
San Diego Natural History Museum (166)
San Diego Audubon (167)
Mr. Jim Peugh (167A)
California Native Plant Society (170)
Endangered Habitats League (182A)
Carmen Lucas (206)

South Coastal Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Ron Christman (215)
Clint Linton (215B)
Frank Brown, Inter-Tribal Cultural Resources Council (216)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society, Inc. (218)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution – Public Notice Only (225A-S)
Linda Vista Planning Group (267)
San Diego Mesa College (268)
University of San Diego (269)
Friars Village HOA (270)
Mission Valley Center Association (328)
Mary Johnson (328B)
Mission Valley Community Council (328C)
Union Tribune (329)
Friends of the Mission Valley Preserve (330B)
Mission Valley Planning Group (331)
General Manager, Fashion Valley (332)
Erin Tobin, Community Manager for Fashion Hills Owners Association
Kristi Echelmeier
Naren Shah
Wendy Soucy
Aamer Abowath
Jennifer Boling
Judy Wiech, Community Manager for Fashion Hills Owners Association
John La Raia, H.G. Fenton Company
Rincon Band of Luiseno Indians
~~Jeffrey Holbrook, LCG Friars LLC, Applicant~~
Philip J. Dowley, Guardian Investment CAP LLC, Applicant
Jennifer Campos, RECON Environmental Inc., Consultant
Melissa Krause, Latitude 33, Consultant

VII. RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.

( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.

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

Copies of the draft 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.

E. Shearer-Nguyen
Senior Planner
Development Services Department

December 23, 2016
Date of Draft Report

March 20, 2017
Date of Final Report

Analyst: E. Shearer-Nguyen

Attachments:

Figure 1 –Regional Location
Figure 2 – Project Site on USGS Map
Figure 3 – Project Location on Aerial Photograph
Figure 4 – Site Plan

Friars Road Residential Mixed-Use MND
Letters of Comment and Responses

Letters of comment to the Draft MND were received during the public review period from the following agencies, organizations, and individuals. While the City is not required to provide written responses to comments received on a Draft MND under CEQA, the City has opted to prepare written responses. The City's responses to comments on the Draft MND represent a good-faith, reasoned effort to address the environmental issues identified by the commenter. The comment letter has been bracketed and numbered to allow for a coordinated numerical reference next to the prepared response. All revisions to the Draft MND made after public review are indicated by strike-out (deleted) and underline (inserted) markings. The letters of comment and responses follow.

Letter A

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

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

January 24, 2017

RECEIVED
JAN 30 2017
Development Services

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

Subject: Friars Road Residential Mixed Use
SCH#: 2016121067

Dear Elizabeth Shearer-Nguyen:

A-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 January 23, 2017, 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
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

A-1 The City acknowledges receipt of the State Clearinghouse letter which indicates that the City has complied with the State Clearinghouse review requirements for a draft environmental document pursuant to CEQA.

Document Details Report
State Clearinghouse Data Base

SCH# 2016121067
Project Title Friars Road Residential Mixed Use
Lead Agency San Diego, City of

Type MND Mitigated Negative Declaration

Description Vesting Tentative map, a site development permit, a neighborhood development permit, and a planned development permit to amend planned commercial development permit no. 87-0232 to allow for the demolition of two 3-story buildings and one 2-story building, totaling approximately 48,180 sf and associated paved parking areas, driveways, and walkways. Subsequent construction would entail two mixed use buildings with 313 (243 apartments and 70 condos) multi-family units with commercial space on the ground level consisting of 6 commercial shopkeeper units, over 2 stories of podium parking. The 243 apartments would be provided in a 103.6 foot tall, 8-story structure. The ground floor of the apartment building would include 6 commercial shopkeeper units. The 70 condo units would be provided in a 9-story, 124.2-ft tall structure. Additionally, the project would icnlude approximately 63,585 sf of open space with private usable open space and common areas including a fitness center, recreation rooms, pools, and a lobby for each structure. An approximate 5,361 sf roof deck would be provided on the roof of the condo structure. The project would also construct various site improvements, including associated hardscape, landscaping, retaining walls, infrastructure and access.

Lead Agency Contact

Name Elizabeth Shearer-Nguyen
Agency City of San Diego
Phone (619) 446-5369 **Fax**
email
Address 1222 First Avenue, MS-501
City San Diego **State** CA **Zip** 92101

Project Location

County San Diego
City San Diego
Region
Lat / Long 32.769699° N / 117.169961° W
Cross Streets Friars Rd/Via de la moda
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways SR 163/I-8/I-805
Airports
Railways
Waterways
Schools
Land Use office and residential uses/CO-1-2/Commercial employment and retail and services

Project Issues Archaeologic-Historic; Biological Resources; Noise; Traffic/Circulation; Vegetation; Wildlife; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 11; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission

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

Document Details Report
State Clearinghouse Data Base

Date Received 12/23/2016 *Start of Review* 12/23/2016 *End of Review* 01/23/2017

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

Letter B

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11, DIVISION OF PLANNING
4050 TAYLOR ST, M.S. 240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711
www.dot.ca.gov

Serious Drought. Help save water!

January 25, 2017

11-SD-163
PM 4.37
Friars Road Residential Mixed Use
MND SCH#2016121067

Mrs. Elizabeth Shearer-Nguyen
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Mrs. Shearer-Nguyen:

B-1 Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

B-2 Caltrans would like to submit the following comments for the Friars Road Residential Mixed-Use Project Mitigated Negative Declaration (MND) located near State Route 163 (SR-163):

1. The traffic study states that the Friars Road and SR-163 Southbound Ramps operate at an existing LOS of C and D. However, in a past traffic study completed in 2008 by LLG for the Friars Road and SR-163 interchange, the Friars Road and SR-163 Southbound Ramps operate at an AM LOS of E and PM LOS of F. The table below is a comparison of intersections of the 2016 traffic study and the 2008 traffic study:

Friars Road / SR 163 SB Ramps	AM Delay	AM LOS	PM Delay	PM LOS
2008 Traffic Study	65.1	E	111.2	F
2016 Traffic Study	30.2	C	44.3	D

B-3 2. The traffic study states that the Friars Road and SR-163 Northbound Ramps operate at an existing LOS of B in the PM. However, in a past traffic study completed in 2008 by LLG for the Friars Road and SR-163 interchange, the Friars Road and SR-163 Northbound Ramps operate at a PM LOS of D. The table below is a comparison of intersections of the 2016 traffic study and the 2008 traffic study:

Friars Road / SR 163 NB Ramps	PM Delay	PM LOS
2008 Traffic Study	40.8	D
2016 Traffic Study	19.6	B

B-1 Comment noted.

B-2 The changes in delay and Level of Service (LOS) at the Friars Road/SR-163 ramp intersections in the existing conditions between the 2008 (SR-163/Friars Road Interchange Project) and the current 2016 (Friars Road Residential) traffic study are due to several well documented reasons. Per the City of San Diego (City) Traffic Impact Study Manual, the 2016 traffic study operations are based on recent counts (i.e., 2015). The 2008 Interchange Project existing condition analyses were based on 2003 traffic counts. Substantial changes to the traffic patterns and traffic volumes have occurred since 2003. See also response to comment B-6 for further validation of the traffic counts. Secondly, the intersection geometry changed since 2003. The SR-163 southbound ramp/Friars Road intersection currently includes a dedicated southbound left-turn lane, which did not exist at the time of the 2003 counts. This improvement was a mitigation measure for the Fashion Walk/Avalon project. Lastly, the intersection analysis methodologies used to calculate delay and LOS have been refined and updated. The 2003 study used the Highway Capacity Manual (HCM) 2000 standards, whereas the 2016 traffic study used the latest HCM 2010 standards. Furthermore, even if the Friars Road traffic study identified LOS E or F at this intersection, the project's contribution to the delay at these ramps would not trigger a significant impact.

B-3 Refer to response to comment B-2.

B-4 3. The street segment between Ulric Street and Frazee Road should be included in the traffic analysis. Per the 2008 LLG Traffic Evaluation Report, this segment had an existing LOS of F using counts from 2003.

B-5 4. The traffic study assumes a capacity of 55,000 for the street segment operations between Avenida De Las Tiendas and Ulric Street. However, in a past traffic study completed in 2008 by LLG, the capacity for the same segment is 50,000. The table below shows the existing street segment operations per the 2008 traffic study:

Roadway Segment	Existing ADT	V/C	LOS
Avenida De Las Tiendas to SR 163 SM Ramp/Ulric St.	55,100	1.10	F
SR 163 SB Ramp/Ulric St. to SR 163 NB Ramps	59,100	1.18	F
SR 163 NB Ramps to Frazee Road	66,400	1.33	F

The table below shows the existing street segment operations per the 2016 traffic study:

Roadway Segment	Existing ADT	V/C	LOS
Avenida De Las Tiendas to SR 163 SM Ramp/Ulric St.	42,743	0.777	C

B-6 5. The report's existing volumes at SR-163 and Friars are inconsistent with recent Caltrans counts:
   a. The EB Friars Road to SB SR-163 on ramp volumes are significantly lower volumes than Caltrans counts.
   b. The SR-163 SB off ramp to Friars Road volumes are significantly lower volumes than Caltrans counts.
   c. The AM NB SR-163 off ramp to WB Friars Road volumes are significantly lower volumes than Caltrans counts.

B-7 6. The WB Friars Road to SB SR-163 on-ramp volumes are not accounted for in the report and in Synchro.

B-8 7. Please clarify how this project is a mixed-use development.

B-9 8. Any additional trips to this interchange and segment of Friars road will make conditions worse. Therefore, the Friars Road Residential Mixed Use Development should consider a "fair-share" contribution to the SR-163 and Friars Road interchange project, which is currently only funded through Phase I.

B-4 The City Traffic Impact Study Manual (July 1998) was used to determine study area segments, and states that "all arterial segments should be included where the proposed project will add 50 or more peak hour trips in either direction." Based on the project trip assignment, the project does not add more than 50 trips in either direction to the segment of Friars Road between Ulric Street and Frazee Road. Therefore, the street segment was not analyzed.

B-5 As detailed in the Friars Road Residential Transportation Impact Study (TIS), the segment of Friars Road between Avenida De Las Tiendas and Ulric Street functionally operates as a 6-lane Prime Arterial in the westbound direction. In the eastbound direction, the segment operates as a 4-lane Major Road due to the presence of the Avenida Del Rio Driveway. In order to account for the roadway conditions in both directions, a "Major/Prime" classification with a modified capacity of 55,000 average daily trips (ADT) was used in the analysis. This capacity is greater than the 50,000 ADT capacity reported in the 2008 LLG report, because it takes into account the westbound Prime Arterial functional classification along this segment. The 55,000 ADT capacity was also used by the approved Quarry Falls (Civita) EIR.

B-6 Traffic counts were commissioned by the applicant's traffic consultant in October 2015 and used in the analysis. Traffic volumes vary hourly, within peak hours, and by day of the week. The traffic counts were conducted via video and are available for review should Caltrans request them. Additional Friars Road/SR-163 ramp intersection counts were obtained by the traffic consultant in October and September 2015, as a part of other projects in the area. A count comparison between the projects was completed and shows that the counts are similar and consistent. See Attachment A for the count comparison table and count sheets.

Mrs. Elizabeth Shearer-Nguyen
Page 3

If you have any questions, please contact Keri Robinson at (619) 688-3193 or by email at keri.robinson@dot.ca.gov.

Sincerely,

JACOB M. ARMSTRONG, Branch Chief
Development Review Branch

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

B-7 The westbound Friars Road to southbound SR-163 was not included in the analysis as the right-turn movement is a free movement and does not affect the intersection operations. However, the westbound volume to Ulric Street was included.

B-8 Six of the units are proposed to be designated "shopkeeper" units with a total of 1,542 square feet of commercial space. Per the Land Development Code (LDC), a shopkeeper unit is a residential dwelling unit with both living quarters and commercial space, which is operated by a resident of the dwelling unit. Therefore, to account for the synergy between the residential and commercial uses, the project was classified as a mixed-use development by the City.

B-9 Comment noted. Since the traffic analysis shows that the project would result in a less than significant direct and cumulative impact to the SR-163/Friars Road interchange, no fair-share contribution is required.

Letter C

Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630

Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

January 5, 2017

Ms. Elizabeth Shearer-Nguyen
Environmental Planner
Development Services Center
City of San Diego
1222 First Avenue, MS-501
San Diego, California 92101

INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION (ND) FOR FRIARS ROAD RESIDENTIAL MIXED USE PROJECT (SCH# 2016121067)

Dear Ms. Shearer-Nguyen:

C-1 The Department of Toxic Substances Control (DTSC) has reviewed the subject ND. The following project description is stated in the ND: "Vesting Tentative Map, a SITE DEVELOPMENT PERMIT, a NEIGHBORHOOD DEVELOPMENT PERMIT, and a PLANNED DEVELOPMENT PERMIT to amend planned commercial development permit no. 87-0232 to allow for the demolition of two 3-story buildings and one 2-story building, totaling approximately 48,180 square feet and associated paved parking areas, driveways, and walkways. Subsequent construction would entail two mixed use buildings with 313 (243 apartments and 70 condos) multi-family units with commercial space on the ground level consisting of 6 commercial shopkeeper units, over 2 stories of podium parking. The 243 apartments would be provided in a 103.6-foot tall, 8-story structure. The ground floor of the apartment building would include 6 commercial shopkeeper units. The 70 condo units would be provided in a 9-story, 124.2-ft tall structure. Additionally, the project would include approximately 63,585 square feet of open space with private usable open space and common areas including a fitness center, recreation rooms, pools, and a lobby for each structure. An approximate 5,361 sf roof deck would be provided on the roof of the condo structure. The project would also construct various site improvements, including associated hardscape, landscaping, retaining walls, infrastructure and access."

C-2 Based on the review of the submitted document DTSC has the following comments:

1. The ND should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.

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C-1 Comment noted.

C-2 The Initial Study/Mitigated Negative Declaration (IS/MND) (Section VIII, Hazards and Hazardous Materials), addresses potential hazards associated with a prior release of hazardous wastes/substances. As detailed in Section VIII d), a record search was completed to identify any prior documented releases of hazardous substances. Based on the completed records search, there has been no release of hazardous wastes/substances within the project boundaries. The cases identified in the Geotracker record search were within 1,000 feet of the project site (but not on the project site), and all are closed cases indicating no hazard is present; therefore, a Phase I Environmental Site Assessment was not warranted. Additionally, the project site is a previously graded pad that is currently used for office buildings.

C-3 2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.

C-4 3. The ND states that the project is "to allow for the demolition of two 3-story buildings and one 2-story building, totaling approximately 48,180 square feet." If planned activities include building demolitions, lead-based paints or products, mercury, and asbestos containing materials (ACMs) should be addressed in accordance with all applicable and relevant laws and regulations as far as the project is proposed for residential development. Mitigation measures should be included in the ND.

C-5 4. If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).

C-6 5. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the ND should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

If you have any questions regarding this letter, please contact me at (714) 484-5476 or email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,

Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Brownfields and Environmental Restoration Program - Cypress

kl/sh/ja

cc: See next page.

C-3 Comment noted. No recognized environmental conditions are known to exist on the project site or within 1,000 feet of the project site. Refer to response C-2.

C-4 Demolition of the existing structures would be completed in compliance with applicable laws and regulations addressing disposal of hazardous materials. All hazardous construction/demolition waste would be separated and disposed of at a facility permitted to receive hazardous wastes in accordance with local, state, and federal regulations.

C-5 Comment noted. The project has prepared preliminary drainage and storm water management plans and will obtain all required Regional Water Quality Control Board permits.

C-6 In the unlikely event of discovery of contaminated soils and/or groundwater, construction/demolition would cease and the any contaminated materials would be evaluated for disposal at a facility that accepts hazardous wastes or remediated, if warranted, in accordance with local, state and federal regulations. Additionally, the project has been conditioned to obtain a bonded grading permit that requires all grading to conform to the requirements of the City of San Diego Municipal Code in a manner satisfactory to the City Engineer. The Grading Permit Improvement Plans shall include the City of San Diego Standard Ground Water Discharge Notes that clearly note how any ground water encountered shall be addressed.

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Guenther W. Moskat, Chief (via e-mail)
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
Guenther.Moskat@dtsc.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail)
Schools Evaluation and Brownfields Cleanup
Brownfields and Environmental Restoration Program - Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2016121067

Letter D

From: Fashion Hills Homeowners

To: E. Shearer-Nguyen, Environment Planner, City of San Diego Development Services Center

Subject: Project Name: Friars Road Residential Mixed Use

Project No 453373/SCH No. To be determined

Community Plan Area;

Linda Vista

Council District: 7

The Fashion Hills Homeowners have gone through the MND and have the following questions and comments.

D-1 1. How many low income housing units will be provided and where are the locations? Linda Vista is in dire need of affordable housing and we want to know if there will be affordable housing in this project.

D-2 2. In figure 3 Project Location on Aerial Photograph – on the off-site impact area - what is the bump outside the project boundary?

D-3 3. What is ground zero elevations and starting elevations?

D-4 4. There appear to be many deviations as shown on Page 17, Table. Why is there a need for so many deviations? Why are rules made and then so many deviations allowed?

5. Height – the city height requirement is 60 feet, the project proposal is for 103.6 feet for lot 3 and 124.2 for lot 2. Why must the city height requirement of 60 feet be doubled? Isn't this unreasonable?

D-5 6. Slope – On page 26 it states a study was done in 2014 that showed the landslides are not probable. There has been a recent mudslide on Ulric and we think that a more current study be accomplished due to the rains in the last 2 years.

D-6 7. Page 32 –Wildlife: Impact on the Cooper's Hawk. The mitigation is to survey the nests during breeding season. Who monitors these activities? On the hillside you can always see coyotes, fox, opossum and many birds. They will be seriously impacted and this development may lead to their disappearance.

D-7 8. Page 39-40 - Planes – The MND says that the flight path will not be impacted for Lindbergh Field. There is no mention made about low flying aircraft that frequently fly over the Fashion Valley Mall to change air conditioning units and other large items. Fire and Police Helicopters are always flying the Linda Vista areas either for fires or to apprehend suspects.

D-8 9. Aesthetics. Surrounding areas – Most buildings are low to mid rise. This has worked very well and fosters a look of continuity. These high rise buildings will look out of place along Friars road.

D-1 The Friars Road Residential Mixed Use project proposes no affordable housing units. Instead, the project would pay an inclusionary affordable housing fee in-lieu of providing at least 10 percent of proposed units dedicated to lower income households as specified in the City's Inclusionary Affordable Housing Regulations, Section 142.1302 of the Municipal Code. The City's Inclusionary Affordable Housing Regulations applies to all new residential development of 2 or more units.

D-2 The off-site impact area shown on Figure 3 of the MND is an off-site eroded slope contained within SDG&E property boundaries that would be graded and backfilled in accordance with project-specific geotechnical investigations. The Biological Technical Report identified this area as Diegan coastal sage scrub, disturbed Diegan coastal sage scrub, and developed land. Impacts to these biological resources were evaluated as part of the project impact footprint and impacts were determined to be less than significant with the incorporation of mitigation. The applicant would be required to stabilize, and restore the slope utilizing permanent soil nails and native vegetation with a "Letter of Permission" from SDG&E. The geotechnical investigations evaluated slope stability and provided recommendations that would be implemented during project grading and construction. Additionally, all graded areas would be treated with erosion control measures including native landscaping as detailed on the project's landscape plan.

D-3 The existing office buildings sit above Friars Road on a raised berm. While Friars Road is at an approximate ground elevation of 61 feet above mean sea level, the ground elevations of the office buildings range from 81 feet above mean sea level at the southern edge of the site to 85 feet above mean sea level at the northern end closer to the slope. The project's proposed starting elevation would be 55 feet above sea level. All referenced grades are shown on the project plans (sheet 2 for existing grades and sheet 3 for proposed grades) that are available at the City.

	D-4 As identified in the IS/MND, the project is requesting a Planned Development Permit with deviations from the Land Development Code. The proposed deviations (increase in floor area and height, setback reductions) are needed to support the proposed density of 319 units. Additionally, due to topographic constraints at the site, retaining wall deviations are required to secure the steep hillside. A Planned Development Permit allows for flexibility in the application of development regulations (i.e. "rules") where the strict application of the zone regulations would restrict design options. The proposed deviations are required to achieve the proposed intensification of density at the site, which is a recommendation in the Linda Vista Community Plan. The Land Development Code permits projects to request deviations from applicable development regulations through a Process 4 Planned Development Permit, provided Findings per Section 126.0604(a) can be met. Findings are included in the Planning Report. D-5 Site-specific geotechnical investigations were prepared for the project site that evaluated the stability of the slopes north of the site. The geotechnical investigations found that the natural grade behind the proposed fill slope is stable, and provides recommendations for ensuring slope stability during project grading. Geotechnical recommendations would be implemented during project grading and construction to ensure adverse impacts related to landslides and mudslides are avoided. An additional final geotechnical report would be prepared during final engineering to be reviewed by qualified City staff. D-6 The MND identified that removal of habitat that supports active nests would occur outside of the breeding season. The mitigation measure further identified that should removal of habitat occur during the breeding season, a qualified biologist would conduct preconstruction surveys to determine presence and/or absence, and identify any necessary monitoring schedules, construction and noise barriers/buffers to ensure that impacts to Cooper's hawk are

D-6 (cont.)

avoided. With implementation of the Biological Resources (Cooper's hawk) mitigation measure, impacts were determined to be less than significant. Monitoring would be conducted by a qualified biologist as required by the City's Biology Guidelines with oversight by the City's Development Services Department, Mitigation Monitoring and Reporting Program staff.

The site-specific biological resources survey and subsequent report prepared by a qualified biologist did not identify significant impacts to sensitive wildlife species. Furthermore, foxes, coyotes, and opossums are not identified as sensitive wildlife per the City's Biology Guidelines, therefore impacts are not identified. The MND identified that the coastal California gnatcatcher, considered a sensitive wildlife species, was observed in the project area but outside of the development footprint. Per the City's Significance Determination Thresholds and the Biology Guidelines, impacts to the coastal California gnatcatcher outside of the MHPA is not considered significant because the it is a species covered by the MSCP.

D-7 As detailed in the IS/MND, the project site is within the Airport Land Use Plan and Airport Influence Area (Review Area 2) for the San Diego International Airport. The project is also located with Review Area 2 for Montgomery Field as depicted in the adopted 2014 Airport Land Use Compatibility Plan (ALUCP). The project is not located in a Safety Zone as depicted in the ALUCP; therefore, the use and density are consistent with the ALUCP. The proposed project height would exceed the height notification surface for the San Diego International Airport and would require notification to the Federal Aviation Authority (FAA) pursuant to the Part 77 height notification surface. Prior to construction, the FAA would be notified. Additionally, the project applicant has submitted the required FAA Self-certification Agreement. No response has been received from the FAA to date.

	D-8 The City recognizes that the project would result in taller buildings along Friars Road in comparison to the mid-rise buildings in the immediate area. However within a three-quarter mile of the project site, there are a number of structures of similar or greater height than the proposed project including a 14-story office building at Hazard Center, 11-story Doubletree Hotel, and multiple 10 plus story buildings near Friars/Murray Canyon Road. Additionally, the existing slope would provide a visual backdrop to the proposed buildings and will soften their appearance in relation to bulk and scale. The MND concludes that impacts related to land use and aesthetics would be less than significant.

LETTER		RESPONSE	
D-9	10. Page 47 - Noise. Although the report says that noise will not be a problem, how can an 11 story building with a 5,000 sq ft rooftop deck that adds another floor to make it a 12th story which will be right in the face of the residents on Camino Degrazia and Camino Berdecio not create noise. This would result in current residents not having quiet enjoyment of their homes. Balconies, lights, flood lights and noise will also come up the hill.	D-9	For purposes of clarification, the proposed condominium building is a 9-story building over podium and partial below/above-grade parking garage (not an 11-story building). The upper podium parking level accommodates the open-air ventilated parking garage, as well as the first level of the condo living units and is counted as one of the nine stories of the structure since it includes condominium units. The top of the condominium building would be located approximately 47 feet below the top of the slope and approximately 312 feet away (horizontal distance) from the closest residence along Camino Berdecio. Residences along Camino DeGrazia would be a located at a horizontal distance of approximately 316 feet from the proposed rear face of the condominium building. Additionally, the condominium deck would be approximately 35 feet below the top of slope elevation at Camino Degrazia. For details of the distances of proposed buildings to residences located in the Fashion Hills neighborhood, refer to the height study in Attachment B. As detailed in the MND, a site-specific noise analysis was prepared for the proposed project which identified that operational noise levels from the project would be typical of any residential use, which would not exceed hourly average property line noise limits for residential properties. Additionally, all rooftop HVAC equipment would be located within mechanical equipment enclosures. Operational noise levels would not exceed City Noise Compatibility Standards and would be consistent with the Noise Ordinance. All noise impacts were determined to be less than significant. Additionally, the project would not result in adverse impacts to residences along Camino Degrazia and Camino Berdecio from lighting coming up the hill. As detailed in Section I.d) of the IS/MND, exterior lighting would comply with City Glare and Outdoor Lighting Regulations (Chapter 14, Article 2, Division 7, Page 2), which would minimize light trespass, require shielding of lighting. All lighting impacts were determined to be less than significant.
D-10	11. Construction Noise – The MND states that construction will be during the day only. No night construction should ever be done. We have a lot of residents that are handicapped and with various life threatening illnesses.		
D-11	12. Page 53 Traffic: The report states that a study showed that traffic would not be affected and most people would use public transportation. This has not proved accurate with Avalon and will not be accurate with this development. Most people will not use public transportation. In the Sunday newspaper 2 weeks ago it said that the golf course would be sold and 4,000 units would be build. This along with the Friars road project would definitely impact traffic. Construction of the 163 interchange will be starting soon with an impact on traffic and they will also be changing to 1 lane going on 163 and l lane getting off 163. Is this taken under consideration? Civita has also added to the horrible traffic on Friars road which makes it nearly impossible to navigate, especially during the holiday season.		
D-12	13. Has it been taken into consideration the impact that the sewer and water system will have in the future years to Linda Vista?		
D-13	Request: The Fashion Hills Homeowners would like you to lower these buildings to the height of Avalon, - that is – not to exceed 5 or 6 stories. It is felt this will be more compatible with the surrounding area and will not interfere with the quality of life of the residents of City Scene, Fashion Hills and the Vistas, or a total of approximately 1,000 people. Judy Wiech Representing Fashion Hills Homeowners Judy_wiech@hotmail.com 6903 Camino Degrazia, San Diego CA 92111 858-292-7058		

	D-10 Comment noted. Consistent with the City Noise Ordinance, construction would be prohibited between the hours of 7 p.m. and 7 a.m., Sundays, and legal holidays. D-11 As detailed in the IS/MND, all transportation and traffic impacts were found to be less than significant. The environmental document does not state that most people would use public transportation. The project did include the development and associated traffic for the Quarry Falls (Civita) and the Riverwalk (Levi-Cushman) sites as a part of the background conditions in the Opening Day and Year 2035 conditions. Based on the City of San Diego traffic significance thresholds, the Friars Road Residential TIS identified no significant impact to the SR-163/Friars Road Interchange. D-12 The IS/MND addresses potential environmental impacts associated with the construction of new water or wastewater facilities and concluded impacts would be less than significant. As detailed in Section XVII of the IS/MND, the project would construct on-site water lines to connect to the existing 16-inch water main in Friars Road. All public water facilities including services and meters would be designed and constructed in accordance with current City Water Facility Design Guidelines and City regulations. For wastewater treatment, the project would construct two private sewer laterals that would connect to the existing 8-inch sewer main per City Standard Drawings for Public Works construction. Only laterals connections and on-site realignment of the sewer main would be required for the project, no line extensions would be necessary. As future projects are proposed that require water and wastewater service, those projects would be subject to environmental analysis to ensure that potential impacts are minimized. D-13 Comment noted.

Letter E

H.G. FENTON COMPANY

TRUST, SERVICE AND INNOVATION SINCE 1906

February 6, 2017

E. Shearer-Nguyen
City of San Diego Development Services
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Friars Road Residential Transportation Impact Analysis Comments

E. Shearer Nguyen:

H.G. Fenton Company respectfully submits the following comments to the Friars Road Residential Transportation Impact Analysis dated October 25, 2016.

E-1
- The Friars Road Residential TIA appendices appear to be missing from the online posting from the City of San Diego. The appendices are critical to understanding the operation of traffic signals in close proximity to a major interchange. In addition, as the proposed project would alter the configuration of an existing traffic signal, the appendices would be helpful in understanding how the signal modification was evaluated.

E-2
- The Friars Residential TIA evaluates the existing office buildings using City of San Diego standard trip generation rates. This assumption is customary for active existing uses; however, it may not be appropriate in this case since existing uses vary from the commercial office designation used in the TIA. A quick search of businesses at the address 6950 Friars Road shows the San Diego Lasik Center (Global Laser Vision), Laser Hair Removal and International Academy of English. A view of the building from the street shows the building signed as a "Medical Center". A quick search of the address at 7020 Friars Road shows a methadone clinic and a comprehensive treatment center. These types of uses are more appropriately classified as "medical office" or as a specialty use (language school) with specialized trip generation characteristics not reflected in the TIA. In-fact, using cumulative trip rates, medical office would have a rate of 20 trips per 1,000 sf while the TIA uses trip rates for existing uses ranging from 28-33 trips per 1,000 sf. The difference is more dramatic for peak hours where the peak hour generation percentage of commercial office is 13% in the AM peak versus 6% for medical office. This means the existing trip credit may be significantly overstated in the TIA. Quite simply, the trip rates used to estimate existing traffic from the site could be almost double what they should be. Since the existing traffic was subtracted from the gross trip generation to create a net increase and the TIA prominently discusses a "reduction" in peak hour trips with the residential, this basic conclusion may be in error and certainly doesn't match the publicly available data. In a situation such as this, existing driveway counts are recommended to establish a proper existing use "credit" and avoid understating impacts.

7577 Mission Valley Road, San Diego, CA 92108 p | 619.400.0120 f | 619.400.0111 www.hgfenton.com

E-1 The City posted the project IS/MND and technical appendices to the City Clerk's website on December 23, 2016, including the project's transportation impact analysis; however, the traffic appendices were not included online. As stated on the City's webpage, "Not all documents may be available for viewing online. Further, graphics, exhibits, and attachments such as technical reports may not be available for viewing online." (https://www.sandiego.gov/development-services/industry/erp). However, all environmental documents, including traffic appendices are available upon request from the City.

E-2 The trip generation calculations were conducted per standard City of San Diego practices and guidelines. The "net new" traffic calculations are based on the trip difference between the proposed use and the historical use of the site as traditional office. This is consistent with existing entitlements; thus, traffic is appropriately represented. Furthermore, since the existing trip credit was based on traditional office rather than medical office, the credit was lower on a driveway trip basis. The credit was based on a trip rate of 27.99 ADT/KSF (799 ADT / 28,548 SF) whereas the driveway trip rate for medical office is 50 ADT/KSF.

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E-3
- The TIA methodology section indicates that the HCM 2010 methodology and Synchro 9 software program were utilized to estimate intersection delay and level of service. Last year, prior to the conclusion of the TIA, three of the six signalized intersections (intersections 1,2 and 3) including the main project access were converted to adaptive traffic control. The 2010 HCM methodology cannot accurately calculate intersection operation under this new control strategy. Although signal operations are likely improved beyond what is shown in the TIA, the TIA is silent on this subject and change. Additionally, the delay and level of service estimates in the TIA are not accurate. This major change in signal operation in the area should be discussed and quantified to the extent feasible for a CEQA study. Additionally, this type of traffic control should be carefully evaluated with respect to the project access and the major change in operation proposed by the project in creating a 4th leg of the intersection. The construction of a 4th leg may not be compatible with the existing system and the project should discuss this change with the signal equipment manufacturer to ensure continuing operation of this important system. It is possible that additional improvements may be necessary to properly maintain this system.

E-4
- The TIA notes that the Levi-Cushman project is responsible for several key roadway improvements including intersection improvements at Fashion Valley Road/Riverwalk access and others. However, as noted in the TIA, the Development Agreement requiring these improvements has expired and the Riverwalk project is being re-planned. Therefore, none of the improvements suggested in the TIA to be completed by the Riverwalk/Levi-Cushman project are either assured or funded. They are not reasonably forseeable and may end up being significantly redefined. Several of the improvements (i.e. Via Las Cumbres river crossing and improvements at Fashion Valley Road/Riverwalk Access/Mall Access) may no longer be feasible as discussed in the TIA. For example, the intersection improvements assumed by the Friars Residential TIA (page 52) mention the reconstruction of the Riverwalk driveway to include one left turn, one thru lane and one right turn lane eastbound as well as restriping the westbound direction to one exclusive left turn lane and one shared thru/right lane (8-phase operation). The feasibility of this improvement should be investigated as the road travels between two supports for the overhead trolley at that intersection. Altering the intersection to the lane configuration suggested may be infeasible due to lane alignment considerations and lack of available room. In addition, as a major bus transit center, any changes in lane configurations should be carefully explored before assuming this change is feasible (let alone will be constructed by other parties). These constraints did not exist at the time the original Levi-Cushman plan was created and illustrate the problems with assuming the revised Riverwalk project may construct such improvements. The analysis of future conditions relying on these improvements is not appropriate and should be revisited. Additional impacts may result.

E-5
- Several of the results shown in the Friars Residential TIA are at odds with the recently released USD Master Plan TIA. Each of these traffic studies were completed at approximately the same time by the same firm (and in some cases the same personnel). Unfortunately, the results are not consistent which is a major potential flaw because only one of the two studies can be correct. Several of the more significant differences are noted below.

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E-3 The adaptive signal control system was installed by the City at three intersections along Friars Road. The system was installed in November 2016, after the traffic analysis was completed and approved by staff in October 2016. Adaptive signal control dynamically adjusts signal timings to react to changing traffic demand to improve operations. The comment acknowledges signal operations will be improved beyond what was reported in the transportation impact study. Therefore, the analysis in the study is conservative and is a reasonable basis to measure potential impacts. The adaptive signal control system is designed to accommodate numerous types of intersection configurations, particularly the traditional 4-leg intersection that is proposed as part of the project.

E-4 The Levi-Cushman Specific Plan (i.e. Riverwalk) identified a number of improvements such as two (2) new river connections/crossings (one of which included the extension of Via Las Cumbres terminating into a new interchange at Interstate 8), the extension of Camino De La Reina to Napa Street (across the Riverwalk development and along existing developments to the West), as well as other road re-alignments and capacity enhancements. These improvements are extensive. Given these improvements are not assured, only minimal Riverwalk/Levi-Cushman infrastructure was assumed. The only improvements assumed were based on providing site access and basic internal circulation for the Riverwalk development, which would have to be provided by the Riverwalk development. Furthermore, 67,000 ADT per the Levi-Cushman/Riverwalk Specific Plan was assumed even though recent plans for the site have been substantial lower (i.e., -25 percent) in traffic generation. Given these assumptions the analysis is reasonable and conservative.

E-4 (cont.)

The comment also incorrectly cites the geometry at Riverwalk Drive/Fashion Valley Road. No improvements were assumed other than providing an eastbound shared left-through lane and a dedicated right-turn lane, which represents the most basic (and conservative) configuration. Initial engineering review by the applicant's consultants did not indicate any physical constraints. As the traffic analysis did not make any assumptions about potential Levi-Cushman/Riverwalk improvements except those that would be internal to the project site and provide basic access, the traffic analysis presents a conservative analysis and no additional or more severe impacts would result due to issues raised in the comment.

E-5 The noted differences between the Friars Road Residential TIS and the University of San Diego Master Plan Traffic Impact Analysis referenced in the comment are detailed below. As shown, the Friars Road Residential TIS represents a conservative analysis, with appropriate assumptions.

<u>Friars Road Capacity</u>

The roadway classification of this segment, per the Mission Valley Community Plan, is a 6-lane Major Road. Given the lack of a raised median physically separating opposing traffic and 4-lanes of travel, the transportation impact report assumed a lower (and conservative) 30,000 ADT capacity. Assuming the higher capacity would only result in better operations than reported. Therefore this difference would not underestimate or affect the determination of project impacts at this location.

<u>Friars Road / SR-163 Southbound Ramps Operations</u>

The variance in delays between the two studies can be attributed to a number of factors. One of the factors includes the existing baseline traffic counts which were conducted a year apart. While similar overall, there are some small variances (which is typical due to daily fluctuations) that can contribute to differing delays.

	E-5 (cont.) In the Near-Term, the Friars Road Residential TIS assumed Phase I improvements of the SR-163/Friars Road interchange based on funding status and project schedule. The other study did not assume these improvements until the Horizon Year 2035. This would explain the differences in Level of Service (LOS). The Friars Road Residential TIS reported LOS D/D for AM/PM conditions and the other project reported LOS E/F. In the Horizon Year 2035, the Friars Road Residential TIS took a conservative approach in the future forecast volumes and reported LOS F/F for AM/PM conditions, while the other project reported LOS D/D. The Friars Road Residential TIS accurately represents conditions at the Friars Road / SR 163 SB Ramps and presents a conservative analysis. <u>Friars Road / SR-163 Northbound Ramps Operations</u> The variance in delays between the two studies can be attributed to a number of factors. One of the factors includes the existing baseline traffic counts which were conducted a year apart. While similar overall, there are some small variances (which is typical due to daily fluctuations) that can contribute to differing delays. In the Near-Term, the Friars Road Residential TIS assumed Phase I improvements of the SR-163/Friars Road interchange based on funding status and project schedule. The other study did not assume these improvements until the Horizon Year 2035. While these improvements help the interchange operations overall, at this location the Phase I improvements would remove the northbound free movements and introduce left-turns to serve the traffic. This would explain the differences in LOS, particularly a worse LOS since left-turns would have a lower capacity than free right-turns. The Friars Road Residential TIS reported LOS D/E for AM/PM conditions and the other project reported LOS C/C in the Near Term with Project Condition. In Horizon Year 2035, both studies report the same LOS D/F for the AM/PM conditions. The Friars Road Residential TIS accurately represents traffic conditions in both the Near Term with Project and Horizon Year condition.

Friars Road / Avenida de las Tiendas Operations

Horizon Year 2035 operations reported between the two studies are similar, particularly when considering operations are projected almost 20 years in the future. In the AM peak period, both studies report an acceptable LOS. In the PM peak period, the Friars Road Residential TIS reports a LOS D while the other study reports LOS E. It appears the other study may have over-represented the westbound left-turn volumes (into the mall) at 800 vehicles per hour. The existing westbound left-turn volume is approximately 440 vehicles per hour based on existing traffic counts and the Friars Road Residential TIS projected a future volume of 620 vehicles per hour based on SANDAG's forecast model. The Friars Road Residential TIS accurately represents existing and future traffic conditions at this intersection.

Friars Road / Fashion Valley Road Operations

The Horizon Year 2035 operations reported between the two studies are very similar, particularly when considering operations are projected almost 20 years in the future. Any variances can be attributed to daily variations in the traffic counts which has bearing on the Horizon Year 2035 volume forecasting. In the AM peak period, the same LOS (LOS C) is reported. In the PM peak period, the Friars Road Residential TIS reports a more conservative LOS (LOS E) than the other study (LOS D). The delays in the PM peak period are also are relatively close. Overall, the Friars Road Residential TIS assumes a more conservative analysis and demonstrates no significant project impact.

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- The road classification and capacity of Friars Road west of Fashion Valley Road is shown as a 4-lane Major collector (30,000 ADT capacity) in the Friars Residential TIA and as a 4-lane Major (40,000 ADT capacity) in the USD Master Plan TIA. The higher capacity shown in the USD Master Plan is more supportable due to the presence of a two way left turn lane providing a buffer between oncoming traffic (similar to a raised median).
- The level of service at the Friars/Ulric/SR-163 SB ramp in the USD Master Plan TIA is significantly worse than the Friars Residential TIA in comparable conditions. For example, in the existing condition (similar counts), the USD TIA shows LOS E/F and the Friars TIA shows LOS C/D. In the Near Term with project (year 2018 vs. year 2019) conditions (each project includes the other and should be comparable), the USD Master Plan TIA shows LOS E/F while the Friars TIA shows LOS D/D. This situation switches in the Long Term (Year 2035) conditions where the USD Master Plan TIA shows the LOS as D/D while the Friars Residential TIA shows the LOS as F/F. Since both studies claim to include traffic from the other project and they have the same buildout year, these conditions should be reconciled.
- The level of service at the Friars/ SR-163 NB ramps is significantly worse in the Friars Residential TIA versus the USD Master Plan TIA. For example, in the Near Term with project condition, the USD Master Plan TIA shows LOS C/C while the Friars Residential TIA shows LOS D/E. in the Long Term scenario (year 2035), the LOS is similar but the delay in the PM peak is significantly different at this location. The USD Master Plan shows a delay of 112.1 in the PM peak while the Friars Residential TIA shows a delay of 87.4. These results should also be reconciled since they are theoretically based on identical assumptions and analysis techniques.
- The level of service at the Friars Road/ Avenida de las Tiendas intersection also significantly differs in the Long Term (year 2035) scenario between the two studies. The USD Master Plan TIA shows a LOS of B/E while the Friars Residential TIA shows a LOS of A/D in the same condition. This should be reconciled as discussed above.
- The level of service at the Friars Road/Fashion Valley Road intersection also significantly differs in the Long Term (year 2035) scenario between the two studies. The USD Master Plan TIA shows a LOS of C/D while the Friars Residential TIA shows a LOS of C/E in the same condition. This should be reconciled as discussed above.

E-6

- The traffic study shows a significant increase in pedestrian traffic crossing Friars Road to Fashion Valley Shopping center either in the form of Mixed-Use traffic or in the form of transit patrons. According to the TIA, up to 287 pedestrian crossings of Friars Road (trip generation table page 19) where only 50 pedestrian crossings are generated today. This could produce a significant disruption to traffic on Friars Road as thru traffic is stopped to allow pedestrians to cross. The combination of the increased pedestrian crossings with the addition of traffic from a fourth leg of the intersection should be evaluated at greater detail in the analysis. The crosswalk should be upgraded and a pedestrian refuge in the median should be considered to the width of Friars Road.

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E-6 Pedestrian activity was appropriately accounted for in the traffic analysis. Pedestrian volumes would increase somewhat at the Friars Road/Via De La Moda intersection with the project. The project would contribute 16 net new pedestrian crossings in the AM peak hour and 19 net new pedestrian crossings in the PM peak hour, based on the transit and mixed-use trip credits shown in the Trip Generation Table (Table 7-1 of the TIS). Additionally, intersection delay is directly affected by the number and frequency of pedestrian signal calls (i.e. pedestrian push button), rather than the actual pedestrian volume. One (1) pedestrian signal call, for example, can serve one (1) pedestrian or 20 pedestrians (in platoon), possibly more. Therefore, the intersection can accommodate a meaningful increase in pedestrian activity with an appropriate number of pedestrian calls per hour, as is the case with the analysis in the traffic report.

The comment also suggests a pedestrian refuge. Pedestrian refuges are typically a treatment for mid-block crossings which would not be applicable to the Friars Road project. Pedestrian refuges are typically used for unsignalized traffic control to assist pedestrians in finding a gap in traffic to safely cross the roadway. The project is proposing a signalized driveway and frontage improvements consistent with City standards and the Mission Valley Community Plan. With signalized traffic control pedestrian phase timing allows pedestrians to safely cross the entire length of the roadway. Adaptive signal control was installed at this location by the City in November 2016, which will also help process pedestrians safely and efficiently.

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E-7 • The project proposes a relatively basic Transportation Demand Management Plan. The plan is primarily limited to providing information to residents, providing bike racks and providing unbundled parking. Although the City, Climate Action Plan requirements do not apply with respect to TDM measures for this project, additional TDM measures should be implemented and explored. These include subsidized transit passes, bikeshare, zip-car/car-to-go options and more. Several other projects in San Diego implement these measures successfully and cost effectively. The project should embrace smart mobility options to reduce the reliance on automobile trips.

E-8 Additional comments may apply after reviewing the appendices; however, these are the major comments based on what is currently published on the City's website. It appears that there are several flaws in the study and the inconsistencies between two studies produced by the same firm at the same time, which is a red flag for both studies. The inconsistencies should be explained at a minimum. The trip generation estimates may also be a significant issue because it is likely that the future trip generation will be significantly higher than disclosed in the study.

Sincerely,

John La Raia
Senior Director Development and Investments

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E-7 Although not a project requirement, the project would implement a number of Transportation Demand Management (TDM) strategies to reduce vehicular trips including providing bicycle racks for resident and shopkeeper/customer use, charging stations for electric vehicles, information and annual events about alternative transportation options, and unbundled parking. Unbundled parking provides an incentive to residents that do not own a vehicle by separating the cost of a parking space from the cost of rent. The project is consistent with the City's Climate Action Plan (CAP) and does not conflict with any policies or regulations addressing alternative transportation. Furthermore, the project would result in a mixed-use development that provides high density residential in proximity to transit and commercial amenities. This type of development is consistent with SANDAG Smart Growth policies and City CAP strategies to locate density in proximity to transit.

E-8 As detailed in the responses above, no major flaws or inconsistencies have been identified in the Friars Road Residential TIS that would result in any new or more severe impacts than disclosed in the analysis. Assumptions used in the analysis are supported by evidence and present a conservative analysis.

Letter F

RINCON BAND OF LUISEÑO INDIANS
Cultural Resources Department
1 W. Tribal Road · Valley Center, California 92082 ·
(760) 297-2330 Fax:(760) 297-2339

January 18, 2017

RECEIVED
JAN 23 2017
Development Services

E. Shearer-Nguyen
City of San Diego
Development Service Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Friars Road Residential Mixed Use Project No. 453373

Dear Ms. Shearer-Nguyen:

F-1 This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the Friars Road Residential Mixed Use Project No. 453373. Rincon is submitting these comments concerning your projects potential impact on Luiseño cultural resources.

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,

Vincent Whipple
Manager
Rincon Cultural Resources Department

Bo Mazzetti, Tribal Chairman · Tishmall Turner, Vice Chairwoman · Steve Stallings, Council Member · Laurie E. Gonzalez, Council Member · Alfonso Kolb, Council Member

F-1 Comment noted. The requirement for Native American monitoring is included in Section V. of the Mitigated Negative Declaration, which identifies the need for the applicant to confer with appropriate persons/organizations when inadvertent discoveries occur during grading activities. The City of San Diego provides draft environmental documents to Native American Tribes from San Diego County when a cultural resources report has been prepared and/or archaeological monitoring is required.

Letter G

San Diego County Archaeological Society, Inc.

Environmental Review Committee

12 January 2017

RECEIVED
JAN 18 2017
Development Services

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

Subject: Draft Mitigated Negative Declaration
Friars Road Residential Mixed Use
Project No. 453373

Dear Ms. Shearer-Nguyen:

G-1 I have reviewed the subject DMND on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the initial study, DMND, and the RECON cultural resources report for the project, we agree that no significant impacts to historical resources will result from project implementation. Consequently, we also agree that no mitigation measures are necessary for historical resources.

We appreciate inclusion in the City's environmental review process for this project.

Sincerely,

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

cc: RECON
SDCAS President
File

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

G-1 Comment noted.

LETTER	RESPONSE

Letter H

From: Jennifer Boling <jen.boling@live.com>
Sent: Monday, January 23, 2017 10:13 AM
To: DSD EAS
Subject: FRIARS ROAD RESIDENTIAL Mixes Use Project # 453373
Attachments: FullSizeRender 6.jpg; IMG_2601.JPG

To: E. Shearer-Nguyen

Hi! I am a resident that lives at 6939 Camino Degrazia above the project being discussed.

H-1 My first concern is if the facts are true on what the Tara Lakes people presented to us home owners in a meeting at our home May, 12 2016. They show on a presentation board that the 11 story 70 condominium building will sit 549 feet away from my residence. I don't believe that is an accurate measurement. I believe its under 300 feet. This also gives me concern if any of the other "facts" that they presented to us were true or not.

H-2 Another is, all the way up and down Friars Road there is no residential complex that is more that 5 stories tall. I am asking for this project to be no more than 5 stories tall. I am concerned with the building being 11 stories tall and the noise and light pollution that will come from it.

H-3 The traffic at Friars and Frazee Rd, Friars and the 163 is a nightmare on any given day. With the Civita project just down the road when finished is going to have a huge impact on the traffic problem already at hand.

Thank you,
Jennifer Boling

H-1 The proposed condominium building is a 9-story building over podium and partial below/above-grade parking garage. The podium parking level is 15 feet, 6 inches above the public walk and accommodates the open-air ventilated partial above/below grade parking garage, as well as the first level of the condo living units. This level is counted as one of the 9 stories of the structure since it includes condominium units. The rooftop and screened mechanical enclosures are not counted as gross floor area as they are not habitable floor area.

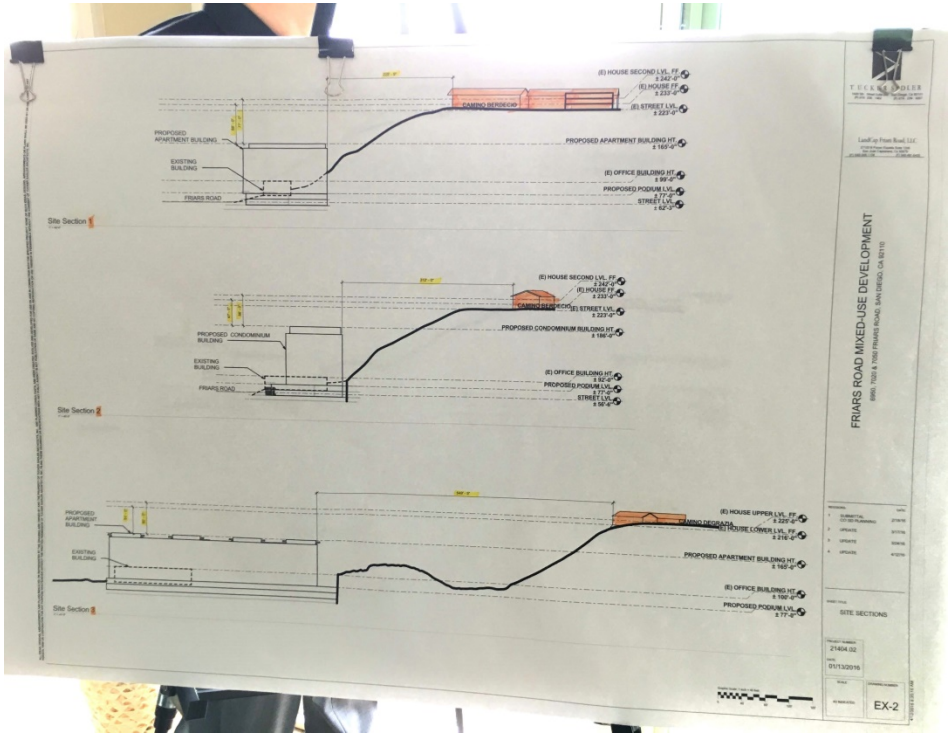
The exhibit referenced as an attachment to the comment does not represent the distances from the commenter's residence, as discussed below. The exhibits presented by the project architect at the referenced May 12, 2016 meeting included a keyed aerial photo with six site sections from Friars Road to six key home areas along Camino Berdecio, Camino Degrazia and Fashion Hills Boulevard. This height study, including all six sections was finalized and included in the project plan set as Sheets EX-1 through EX-3 and has been included as Attachment B to this response for reference. The site sections shown in the exhibit provided by the commenter are Site Sections 1 through 3. However, site Section 6 was the focus of the meeting, which showed a section cut at the 6939/6933/6927/6921 Camino DeGrazia residences. This graphic showed that the front face of the Camino DeGrazia residences would be approximately 316 feet from the proposed rear face of the condominium building. The 549-foot horizontal clear dimension referenced in the comment was for Site Section 3 and represented the cut from Camino Degrazia to the proposed face of apartment building to the west.

The referenced graphic was one of several exhibits presented at the meeting, which included a computer generated topographic exhibit (the exhibit included as an attachment to the comment letter), aerial photos, and existing and proposed photorealistic renderings specifically from Ms. Boling's upper and lower balconies to help assist in a future real world view.

	H-2 The City recognizes that the proposed project height is taller than buildings along Friars Road, with the nearby Avalon project consisting of five residential stories above a similar elevated podium parking garage. However within a three-quarter mile of the project site, there are a number of structures of similar or greater height than the proposed project including a 14-story office building at Hazard Center, 11-story Doubletree Hotel, and multiple 10 plus story buildings near Friars/Murray Canyon Road. The IS/MND evaluated potential impacts related to visual character, noise, and lighting and concluded that impacts would be less than significant (refer to Sections I, Aesthetics and XII, Noise). H-3 Comment noted. As detailed in the Friars Road Residential TIS and Section XVI, Transportation/Traffic of the IS/MND, transportation and traffic impacts of the project would be less than significant. The project did include the development and associated traffic for the Quarry Falls (Civita) and Riverwalk (Levi-Cushman) sites as a part of the background conditions in the Opening Day and Year 2035 conditions. Based on the City traffic significance thresholds, the project traffic analysis identified less than impacts to the SR-163/Friars Road Interchange.

LETTER

RESPONSE



ATTACHMENT A

Existing Traffic Volume Comparison

Attachment A
Existing Traffic Volume Comparison

INTERSECTION	DIRECTION	Friars Road Residential Project (October 2015)[a]							Traffic Count from SR 163/Friars Road Interchange Project (September 2015)[b]							Volume Delta	
		Ram	Rpm	Tam	Tpm	Lam	Lpm	Total	Ram	Rpm	Tam	Tpm	Lam	Lpm	Total		
Friars Road / SR163 SB Ramps/Ulric Street	Sb	93	89	2	5	326	477		92	141	3	4	314	370			
	Wb	510	652	932	1085	0	0		542	519	797	961	0	0			
	Nb	640	650	39	36	286	269		526	552	38	33	281	250			
	Eb	226	674	508	1528	47	124		223	634	425	1455	44	103			
Subtotal								9198							8307	891	10%

INTERSECTION	DIRECTION	Friars Road Residential Project (October 2015)[a]							Traffic Count from Mission Valley Community Plan Update (September 2015)[c]							Volume Delta	
		Ram	Rpm	Tam	Tpm	Lam	Lpm	Total	Ram	Rpm	Tam	Tpm	Lam	Lpm	Total		
Friars Road / SR163 NB Ramps	Sb	667	947	0	0	0	0		690	929	0	0	0	0			
	Wb	714	896	1188	1333	0	0		703	893	1488	1421	0	0			
	Nb	1076	1451	0	0	0	0		857	524	0	0	0	0			
	Eb	0	0	1048	1986	426	669		0	0	1116	2356	399	567			
Subtotal								12401							11943	458	4%

Footnotes:

a.Friars Road Residential project traffic counts were conducted on Tuesday, October 6, 2015.

b. SR 163/Friars Road Interchange traffic counts were conducted on Thursday, September 17, 2015. Count sheet is attached.

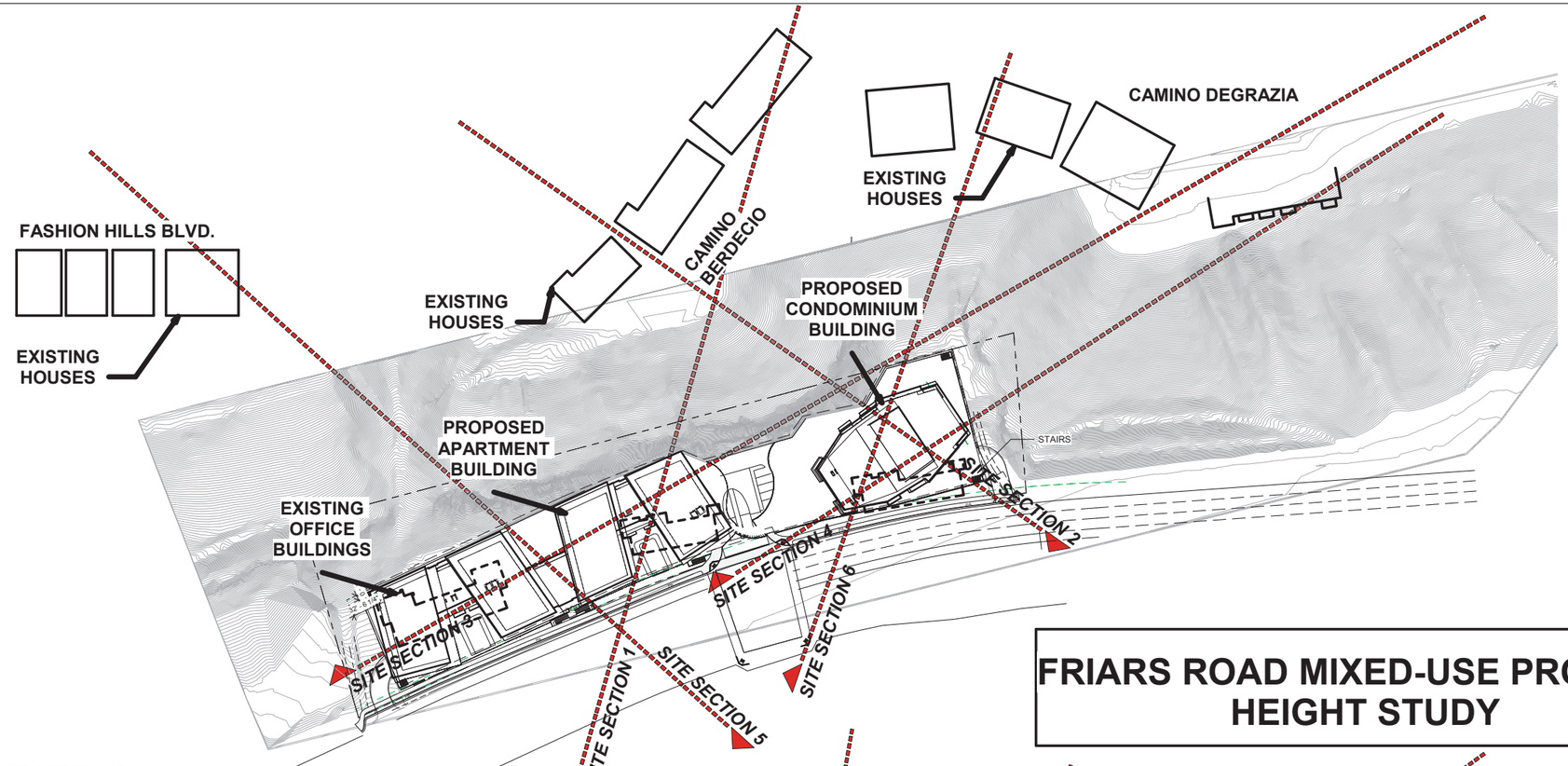
c.Traffic counts obtained from Mission Valley Community Plan Update, Draft Existing Conditions Report. Traffic counts conducted on September 10, 2015. Count sheet has not been published at this time.

General Notes:

1. Ram - Right-Turn movement during the AM peak hour
   Tam - Through movement during the AM peak hour
   Lam - Left-Turn movement during the AM peak hour
   Rpm - Right-Turn movement during the PM peak hour
   Tpm - Through movement during the PM peak hour
   Lpm - Left-Turn movement during the PM peak hour
2. The comparison was conducted for the total number of vehicles entering the intersection during the peak hours.

ATTACHMENT B

Height Study



FRIARS ROAD MIXED-USE PROJECT- HEIGHT STUDY

PLAN WITH SITE SECTIONS

1" = 60'-0"

Graphic Scale: 1 inch = 60 feet

0 60' 120' 180' 240'

AERIAL VIEW

TUCKER SADLER
1620 5th Street Suite 200 San Diego, Ca 92101
(P) 619 . 236 . 1662 (F) 619 . 236 . 9267

LandCap Friars Road, LLC
27132 B Paseo Espada Suite 1206
San Juan Capistrano, Ca 92675
(P) 949.348.1104 (F) 949.481.6403

FRIARS ROAD MIXED-USE DEVELOPMENT
6950, 7020 & 7050 FRIARS ROAD, SAN DIEGO, CA 92110

REVISIONS:		DATE:
1	SUBMITTAL CO SD PLANNING	2/18/16
2	UPDATE	3/17/16
3	UPDATE	3/24/16
4	UPDATE	4/11/16
5	UPDATE	4/15/16
6	UPDATE	4/25/16
7	UPDATE	5/25/16
8	UPDATE	7/01/16
9	UPDATE	8/04/16
10	UPDATE	8/12/16
11	UPDATE	9/07/16
12	UPDATE	9/12/16
13	UPDATE	10/20/16

SHEET TITLE:

SITE PLAN AND AERIAL VIEW

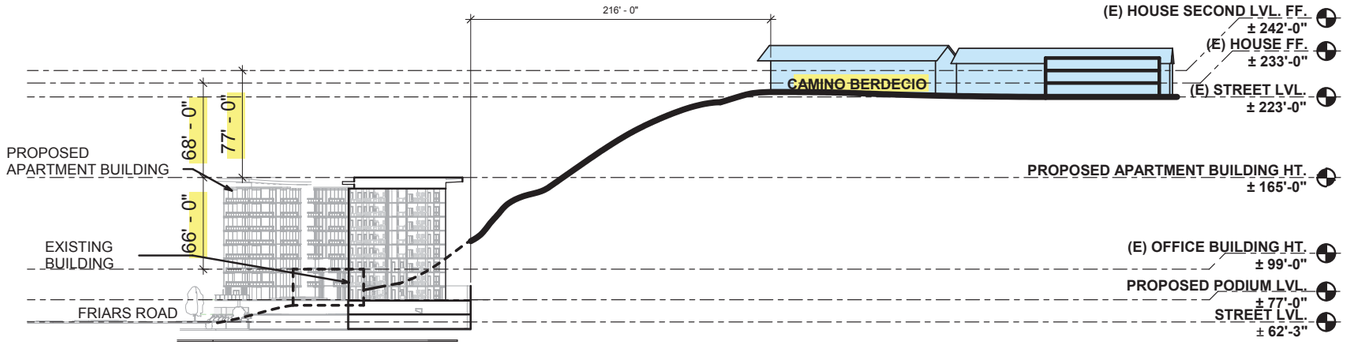
PROJECT NUMBER: 21404.02

DATE: 10/20/16

SCALE: AS INDICATED

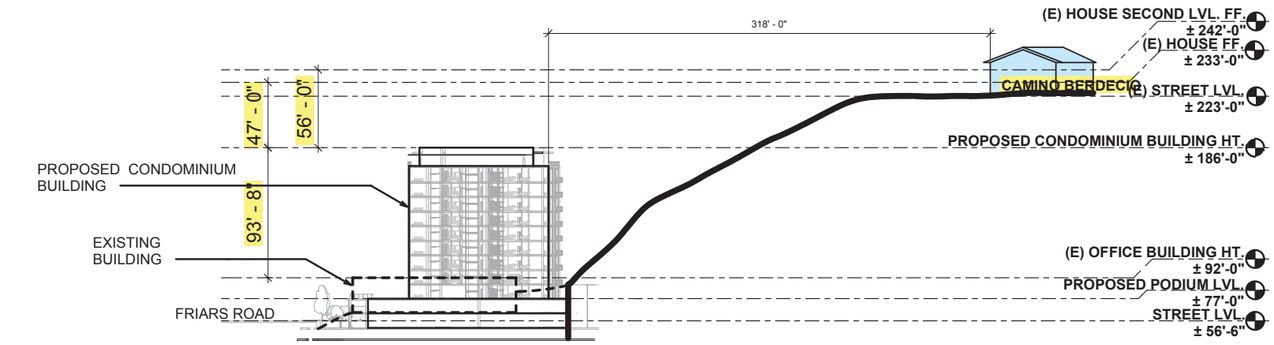
DRAWING NUMBER: EX-1

10/26/2016 2:51:32 PM



Site Section 1

1" = 40'-0"



Site Section 2

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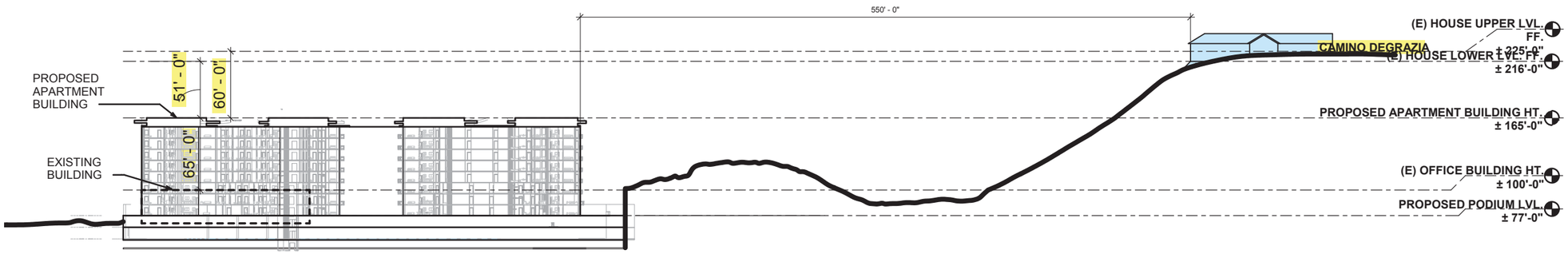


Site Section 3

1" = 40'-0"

Graphic Scale: 1 inch = 40 feet

0 40' 80' 120' 160'

TUCKER SADLER
1620 5th Street Suite 200 San Diego, Ca 92101
(P) 619 . 236 . 1662 (F) 619 . 236 . 9267

LandCap Friars Road, LLC
27132 B Paseo Espada Suite 1206
San Juan Capistrano, Ca 92675
(P) 949.348.1104 (F) 949.481.6403

FRIARS ROAD MIXED-USE DEVELOPMENT

6950, 7020 & 7050 FRIARS ROAD, SAN DIEGO, CA 92110

REVISIONS:		DATE:
1	SUBMITTAL CO SD PLANNING	2/18/16
2	UPDATE	3/17/16
3	UPDATE	3/24/16
4	UPDATE	4/11/16
5	UPDATE	4/15/16
6	UPDATE	4/25/16
7	UPDATE	5/25/16
8	UPDATE	7/01/16
9	UPDATE	8/04/16
10	UPDATE	8/12/16
11	UPDATE	9/07/16
12	UPDATE	9/12/16
13	UPDATE	10/20/16

SHEET TITLE:

SITE SECTIONS

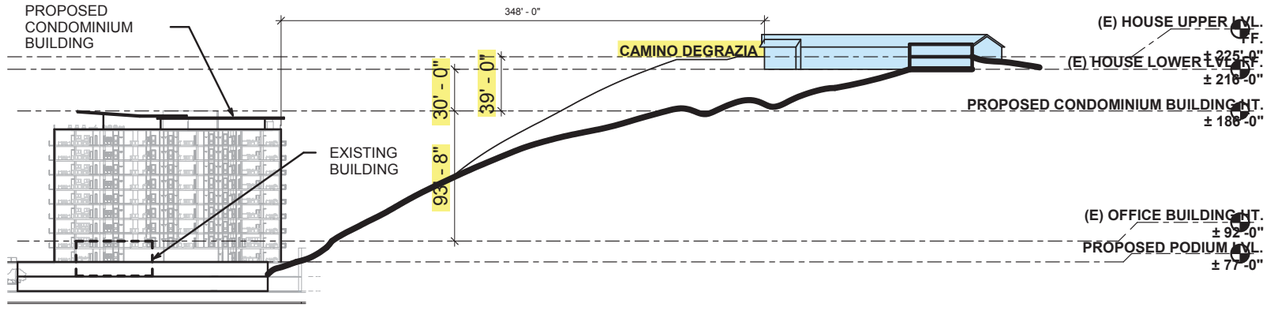
PROJECT NUMBER: 21404.02

DATE: 10/20/16

SCALE: AS INDICATED

DRAWING NUMBER: EX-2

10/26/2016 2:29:20 PM



Site Section 4

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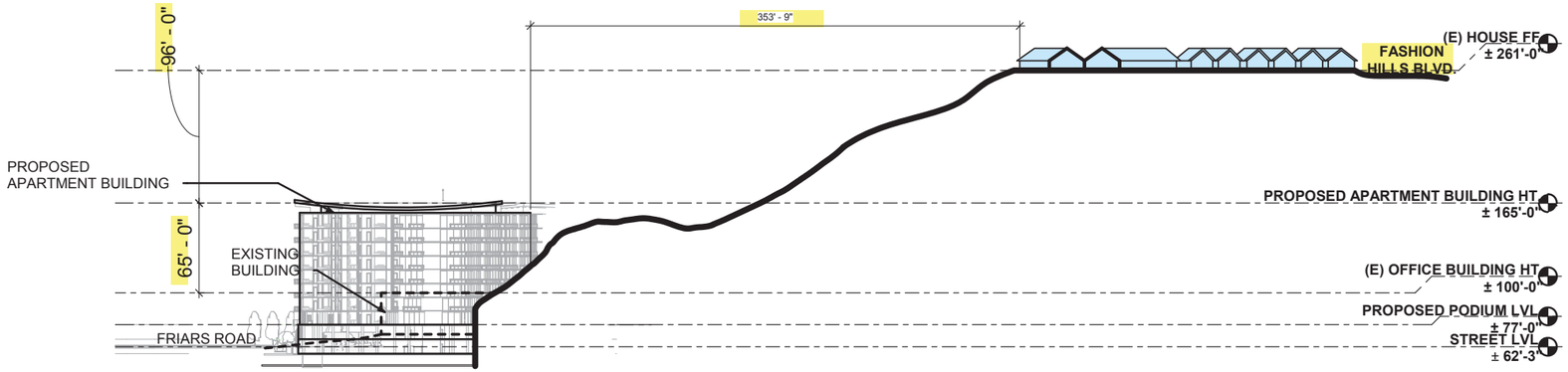

Site Section 5

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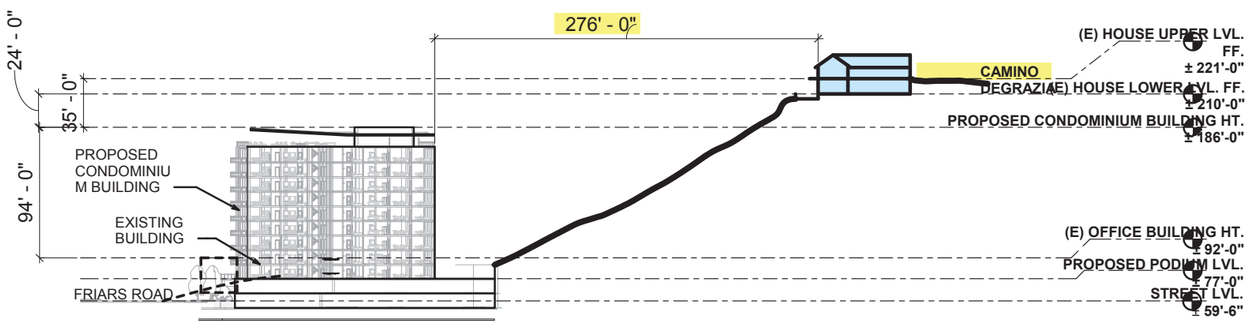

Site Section 6

1" = 40'-0"

Graphic Scale: 1 inch = 40 feet

0 40' 80' 120' 160'

TUCKER SADLER
1620 5th Street Suite 200 San Diego, Ca 92101
(P) 619 . 236 . 1662 (F) 619 . 236 . 9267

LandCap Friars Road, LLC
27132 B Paseo Espada Suite 1206
San Juan Capistrano, Ca 92675
(P) 949.348.1104 (F) 949.481.6403

FRIARS ROAD MIXED-USE DEVELOPMENT

6950, 7020 & 7050 FRIARS ROAD, SAN DIEGO, CA 92110

REVISIONS:		DATE:
1	SUBMITTAL CO SD PLANNING	2/18/16
2	UPDATE	3/17/16
3	UPDATE	3/24/16
4	UPDATE	4/11/16
5	UPDATE	4/15/16
6	UPDATE	4/25/16
7	UPDATE	5/25/16
8	UPDATE	7/01/16
9	UPDATE	8/04/16
10	UPDATE	8/12/16
11	UPDATE	9/07/16
12	UPDATE	9/12/16
13	UPDATE	10/20/16

SHEET TITLE:

SITE SECTIONS

PROJECT NUMBER: 21404.02

DATE: 10/20/16

SCALE: AS INDICATED

DRAWING NUMBER: EX-3

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INITIAL STUDY CHECKLIST

1. Project title/Project number: Friars Road Residential Mixed-Use/453373/SCH No. 2016121067

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: E. Shearer-Nguyen / (619) 446-5369

4. Project location: 6950, 7020, and 7050 Friars Road, San Diego, California 92108 (Assessor's Parcel Numbers 437-250-22, -23, and -24)

5. Project Applicant/Sponsor's name and address: Jeffrey Holbrook, LCG Friars LLC, 27132 B Paseo Espada, Suite 1206, San Juan Capistrano, CA 92657

6. General / Community Plan designation:

   General Plan: Commercial Employment, and Retail and Services

   Community Plan (Linda Vista Community Plan): Commercial Office with Medium High Density (30-43 dwelling units per acre [du/acre])

7. Zoning: CO-1-2 (Commercial Office). The CO-1-2 is intended to accommodate a mix of office and residential uses that serve as an employment center and permits a maximum density of 1 dwelling unit for each 1,500 square feet of lot area

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.):

   VESTING TENTATIVE MAP, a SITE DEVELOPMENT PERMIT, a NEIGHBORHOOD DEVELOPMENT PERMIT, and a PLANNED DEVELOPMENT PERMIT to amend Planned Commercial Development Permit No. 87-0232 to allow for the demolition of two 3-story buildings and one 2-story building, totaling approximately 48,180 square feet and associated paved parking areas, driveways, and walkways. Subsequent construction would entail two buildings with a total of 313 (243 apartments and 70 condominiums) multi-family units with commercial space on the ground level consisting of 6 commercial shopkeeper units, over 2 stories of podium parking.

   The 243 apartments would be provided in a 103.6-foot tall, 8-story structure. The ground floor of the apartment building would include the 6 commercial shopkeeper units. The commercial shopkeeper units would be occupied as a residence and the resident of the dwelling unit would operate the commercial space. Shopkeeper units would have two access points, one public access facing Friars Road and a separate private, secured entrance internal to the structure. A Neighborhood Development Permit is required for encroachment of the public access stairs and elevator tower into the public right of way. The

70 condominium units would be provided in a 9-story, 124.2-foot tall structure at the eastern end of the site. Refer to Table 1 for the unit mix for the entire project.

Table 1
Unit Mix

Lot Number	Unit Type	One-bedroom	Two-bedroom	TOTAL
2	Condominium	34	36	70
3	Apartment	133	110	243
3	Commercial Shopkeeper	6	0	6
Total Number of Units		**173**	**146**	**319**

Two levels of podium parking would be provided under the structures. The parking structures would be located partially below grade with the remainder above grade. A total of 493 parking spaces would be provided within the parking structures. Ten accessible parking (including five van) spaces would be provided on-site. Thirty-four motorcycle spaces would be provided. The project would also provide 170 bicycle spaces. Additionally, thirty bicycle lockers would be provided in the parking garages, providing 760 square feet of space for secured bicycle storage.

The project includes approximately 63,585 square feet of open space with private usable open space (e.g., balconies) and common areas including a fitness center, recreation rooms, pools, and a lobby for each structure. An approximate 5,361-square-foot roof deck would be provided on the roof of the condominium structure.

The Land Development Code, Section 126.0604(a), allows a project in the Affordable/In-Fill Housing and Sustainable Buildings to request deviations from applicable development regulations in accordance with a Process 4 Planned Development Permit. Deviations requested by the project include the following (and shown in Table 3):

1. Front Yard Setback: A deviation from San Diego Municipal Code Section 131.0531, Table 131-05D requires a minimum front setback of 10 feet on lots 2 and 3 per/in the CO-1-2 zone. The project proposes a minimum front setback of 6 feet for Lots 2 and 3.

2. Rear Yard Setback: A deviation from San Diego Municipal Code Section 131.0531, Table 131-05D and 131.0543(b) requires a minimum rear setback of 10 feet and zero feet is the optional rear setback per/in the CO-1-2 zone. The project proposes a minimum rear setback of zero and 10 feet where there is a diagonal line connecting the two point on Lot 2.

3. Retaining Wall Height: A deviation from San Diego Municipal Code Section 142.0340 requires a maximum wall height of 6 feet. The project proposes a retaining wall height of 88 feet on Lot 2 and 91 feet on Lot 3.

4. Structure Height: A deviation from San Diego Municipal Code Section 131.0531, Table 131-05D requires a maximum structure height of 60 feet per/in the CO-1-2 zone. The project proposes a maximum structure height of 124.2 feet for building on Lot 2 and 103.6 feet for the building on Lot 3.

5. Floor Area Ratio: A deviation from San Diego Municipal Code Section 131.0531, Table 131-05D requires a maximum floor area ratio of 1.50 per/in the CO-1-2 zone. The project proposes a maximum floor area ratio of 1.58.

6. Ground Floor Residential: A deviation from San Diego Municipal Code Section 131.0540(a)(1) prohibits residential uses and residential parking on the ground floor in the front 50 percent of the lot. The project proposes residential in the front 50 percent of the lot with the commercial shopkeeper units.

Table 2
Required Deviations

	CO-1-2 Zone	Proposed
Front Setback	10'	6' on Lots 2 and 3
Minimum Rear Setback	0' or 10'	0' on Lot 2
Maximum Retaining Wall Height	6'	88' on Lot 2 91' on Lot 3
Maximum Structure Height	60'	124.2 for building on Lot 2 103.6 for buildings on Lot 3
Maximum Floor Area Ratio	1.50	1.58
Ground Floor Residential	Not allowed in front 50% of lot	Proposed in front 50%

The project would conform to Council Policy 900-14 criteria by committing to achieve a Leadership in Energy and Environmental Design (LEED) Silver Level Certification, in conformance with the criteria of the Affordable/In-Fill Housing and Sustainable Buildings Expedite Program. The project incorporates a roof-mounted photovoltaic system consisting of solar panels, energy efficient windows and doors, and storm water and irrigation management for water conservation. The driveways include permeable pavers to allow surface water infiltration to minimize water runoff. Roof drains will flow onto permeable pavers for pre-treatment prior to draining to in-ground storm water filters for treatment.

Landscaping and Brush Management
The project would incorporate landscaping throughout the project site including street trees along the project frontage, landscaping in common areas, the parkway and street yard, and landscaping within previously disturbed slopes.

The northern side of the property along the base of the slopes would be landscaped with a living wall or green screen. A permanent green wall affixed to the slope with soil nails would be installed to provide stabilization to areas of eroding slope.

The project would implement appropriate landscaping in accordance with the project's brush management zones. Brush Management Zone 1 includes the area adjacent to the structure and would consist of permanently irrigated ornamental planting. The width of Zone 1 would range from 10 to 79 feet. Zone 2 is the area between Zone 1 and the undisturbed, native or naturalized vegetation. Zone 2 vegetation would be pruned to reduce fuel loading. The width of Zone 2 would range from zero to 65 feet.

Transportation, Circulation, and Frontage Improvements
Access to the project is proposed from Friars Road via three (3) driveways including the two existing driveways east and west of Via De La Moda, and a new driveway at the Friars Road / Via De La Moda intersection that would serve as the primary access to the site. Access to the site would be gate controlled. In order to provide primary access to the project site, the project would construct the north leg of the Friars Road/Via de la Moda intersection and reconfigure the intersection to accommodate the north leg. A dedicated westbound right-turn lane would be provided. The southbound movements would have a dedicated left-turn lane and a shared right-turn/through/left-turn lane. The northbound movement will provide a dedicated left-turn lane and a shared through/right-turn lane. The project includes widening of Friars Road along the project frontage to accommodate an additional (third) westbound lane, consistent with the ultimate Linda Vista and Mission Valley Community Plan six-lane Major Road classification.

The project would improve the connection between the light rail station at Fashion Valley Mall and the project site through the use of signage, sidewalk, and crosswalk improvements. The project would provide a 5-foot-wide pedestrian sidewalk in addition to a 5-foot-wide planted parkway along the project frontage. Landscaping and street trees would be provided within the parkway.

The commercial shopkeeper units would be accessible to pedestrians from the public sidewalk via stairwells or elevator access. Pedestrian access to and from the project site onto public sidewalks along Friars Road would be provided to facilitate pedestrian connection to the neighboring commercial amenities. Access to Fashion Valley Mall would be available via two crosswalks at Via de la Moda, directly across from the main project entrance.

Utilities
The project would include on-site infrastructure improvements, as well as connections to off-site utilities located in Friars Road. The project would construct on-site water lines to connect to the existing 16-inch water main in Friars Road. For wastewater treatment, the project would construct two private sewer laterals that would connect into the existing 8-inch PVC sewer main per City of San Diego standards. Existing water and sewer pipelines are currently available in Friars Road to serve the existing development; therefore, project improvements would be limited to on-site improvements and connections to existing facilities and installation of storm drain pipes, inlets, and permanent best management practices (BMP) such as biofiltration basins.

The existing drainage pattern for the site would be similar to existing drainage patterns except that water quality devices would be installed to capture and treat runoff before discharging to the 30-inch public reinforced concrete pipe (RCP) storm drain within Friars Road. Runoff from the steep hillsides north of the project would be captured in a concrete ditch behind the retaining wall and collected within two proposed public catch basins on the east and west ends of the wall and conveyed directly to the public storm drain system.

Demolition, Grading, and Construction
As previously discussed, the two 3-story buildings and one 2-story building, totaling approximately 48,180 square feet would be demolished. All paved parking areas, driveways, and walkways, totaling approximately 486,680 square feet, would also be demolished. The two existing residential buildings (containing 77-units) would remain.

The project would involve grading 2.96 acres of the 5.43-acre project site. Grading would entail approximately 106,000 cubic yards (cy) of excavation with approximately 96,000 cy to be exported off-site. Approximately 3.9 acres of the site contain slopes with a 25 percent or greater grade and 1.05 of those acres would be graded as part of the project. Additionally, consistent with the recommendations of the project's geotechnical evaluation, steep slopes would be stabilized through installation of permanent soil nails and a green wall.

An existing ground-level T-Mobile site (12 antennas and 3 equipment cabinets) would be moved to a new location on-site. The new T-Mobile site would contain 6 antennas and would be co-located on the rooftop of one of the proposed multi-family buildings. The associated equipment cabinets would be located on the ground. A temporary T-Mobile site would be arranged during demolition and construction of the project and would be located on-site within the project development footprint until it can be relocated to the roof of one of the structures.

Project construction is expected to take approximately 20 months to complete.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

The 5.43-acre project site is located at 6950, 7020, and 7050 Friars Road, on the northern side of Friars Road, just east of Fashion Valley Road and approximately one-quarter mile west of Ulric Street. The project site is located across the street from Fashion Valley Mall at the Via de La Moda entrance. The project site currently contains three office buildings, two residential structures, and an asphalt surface parking lot. The eastern end of the site and the steep slopes along the northern portion of the site are undeveloped and contain Diegan coastal sage scrub and disturbed Diegan coastal sage scrub. Some eucalyptus trees are located at the western end of the site.

The northern part of the site and north of the project boundary is a steep hillside that rises up to the higher elevation mesa occupied by residential uses within the Linda Vista community. On the top of the steep hillside, located north of the project boundary, between the project site and the residential uses to the north is San Diego Gas and Electric (SDG&E) property. Steel lattice towers and associated wires for electricity transmission are located in

this area. Multi-family residential land uses are located to the east and west of the project site along the northern side of Friars Road.

The project site is designated Commercial Office at a Medium High Density (30-43 dwelling units per acre [du/acre]) and within the Friars Road Neighborhood per the Linda Vista Community Plan area. The site is zoned CO-1-2 (Commercial Office). Additionally, the project is within the following overlay zones: Very High Fire Hazard zone, Development Intensity District C (DID C), Airport Influence Area (Review Area 2) for Montgomery Field, Airport Land Use Compatibility Overlay Zone for Montgomery Field, and the Federal Aviation Administration Part 77 Noticing Area for Montgomery Field and San Diego International Airport. The parcel is situated in a neighborhood setting of similar uses. Furthermore, the project site is located in a developed area currently served by existing public services and utilities.

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.

A Native American Tribe traditionally and culturally affiliated with the project area has requested consultation with the City of San Diego pursuant to Public Resources Code section 21082.3 (c). The City is in consultation with this tribe.

Information retrieved as part of the literature review and record search revealed that one previously recorded prehistoric cultural resource to be mapped within the area of potential effect (APE). Grading for previous road construction as well as realignment and widening, commercial developments, in addition to mining and agricultural practices have resulted in the loss of this resource. Additionally generous mapping techniques of the past likely erroneously placed site boundaries in areas where the site was not actually located, such as up and along the 30-foot degree slope face of the Linda Vista Terrace immediately north of the project site. Because there is a low potential to encounter archaeological subsurface materials during ground-disturbing activities, no further work was necessary. No impact would result.

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.

☐	Aesthetics	☐	Greenhouse Gas Emissions	☐	Population/Housing
☐	Agriculture and Forestry Resources	☐	Hazards & Hazardous Materials	☐	Public Services
☐	Air Quality	☐	Hydrology/Water Quality	☐	Recreation
☒	Biological Resources	☐	Land Use/Planning	☐	Transportation/Traffic
☒	Cultural Resources	☐	Mineral Resources	☐	Tribal Cultural Resources
☐	Geology/Soils	☐	Noise	☐	Utilities/Service System
☒	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
I)	AESTHETICS – Would the project:				
	a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

Pursuant to the City's Significance Determination Thresholds, impacts associated with scenic views may be significant if the project would create a substantial obstruction to the scenic views from a public viewing area. The project site is not identified as being within a scenic vista and, therefore, would not adversely affect a scenic vista (refer to Section I.c for height discussion on community character).

The project site is developed with existing office/commercial structures, is located within a major commercial corridor along Friars Road, and is not considered a scenic vista. The project would not block any scenic vistas and would not be visible from residential areas north of the project site. Thus, the project would have a less than significant impact on a scenic vista.

	b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans 2011) and are highways that maintain sensitive landscapes or valuable scenic resources within the highway viewshed. There are no state scenic highways within the immediate project site area. Therefore, the project would not have an adverse effect on a scenic resource within a state scenic highway. No impact would occur.

	c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐

The surrounding area is composed of urban commercial, office, and residential uses. The project site currently contains three professional office buildings and associated parking. The Friars Road area has a diverse mix of uses from residential to large-scale commercial associated with the adjacent Fashion Valley mall.

The project would require deviations from applicable development regulations as detailed in Table 2 of the project description. Deviations applicable to the visual character and quality of the site are primarily related to the proposed structure heights which would exceed the 60 foot height allowance according to the CO-1-2 zone. The proposed condominium structure height would be 124.2 feet tall and the apartment structure with commercial shopkeeper units on the ground floor would be 103.6 feet height. Although the structure would exceed the allowable height of 60 feet, the proposed structures would not be visually obtrusive from Friars Road due to the backdrop of the existing slope that exceeds the height of the building. The top of the existing slope and the development on the ridge would remain visible from Friars Road and the surrounding area. The scale of the proposed structures would be consistent with the bulk and scale of surrounding development including Fashion Valley Mall and multi-family residential developments in the surrounding area.

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

The project would also require a deviation to allow retaining wall heights up to 91 feet. However, the retaining walls would not visually detract from the visual character of the site or the surrounding area because they would be located behind the proposed structures and therefore not visible from the street.

The Linda Vista Community Plan identifies the slopes along Friars Road as natural amenities to be conserved. Project implementation would not adversely impact any natural slopes along Friars Road because the project is proposed on an existing developed and previously graded site. The project would stabilize and plant portions of the existing disturbed and eroding slope. Additionally, the project would retain the eastern, undisturbed portion of the site in its existing condition. Thus, the project would not adversely affect natural slopes along Friars Road.

The project would replace these three circa 1981 buildings with modern architectural style buildings. This change would not be significant, as the area does not have a single or common architectural theme. Architecture at Fashion Valley Mall is diverse but has in common the large scale and mass of structures. Thus, the proposed modern architectural style would not be in contrast to the adjacent developments. Although the project height would be greater than surrounding structures, the overall character of the project would be consistent with the scale and bulk of nearby structures, such as structures within the Fashion Valley Mall.

The project would include variations in height and depth of wall surfaces to break up the street level façade. The apartment structure is designed to break up the views of the structure from the street by setting back portions of the structure and providing open space areas within the recessed areas. Landscape elements along the street frontage and other architectural elements such as balconies and stairwells to the podium level would provide further softening of the structural elements of the project. These details would serve to break down large surface areas and relate to the pedestrian scale. An enhanced pedestrian path would be provided along the project frontage with landscaping and street trees. In summary, the project would result in less than significant impacts related to visual character and quality of the site and the surrounding area.

d)	Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Light

The project would include replacing the three existing structures with a mixed-use development in an urban area. Exterior or outdoor lighting would comply with the City regulations (San Diego Municipal Code §142.0740, Outdoor Lighting Regulations). Project lighting would be consistent with existing light sources associated with surrounding development. No substantial sources of light would be generated during project construction, as construction activities would occur during daylight hours. Thus, impacts would be less than significant.

Glare

The project would incorporate glass into some portions of the façade. As the project would comply with City regulations (San Diego Municipal Code §142.0730, Glare Regulations), the refection of

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

natural or artificial light off the glass would not present an adverse glare effect. Impacts would be less than significant.

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

a) Converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

The project site does not contain any agricultural resources, lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no agricultural resources including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance would be converted to a non-agricultural use and no impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒

There are no Williamson Act Contract lands or agricultural zones on or near the site. Thus, the project would have no impact on agriculturally zoned land or Williamson Act Contract land.

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))?	☐	☐	☐	☒

The project site supports existing development and is zoned CO-1-2 (commercial open space). No forest land or timberland exists on or near the project site. Thus, the project would have no impact on such resources.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

The project site supports existing development. No forest land or timberland exists on or near the project site. Thus, the project would not impact such resources.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Neither the project site nor the surrounding area contains any farmland or forestland. The site is located in an urban, developed setting. Thus, the project would have no impact on farmland or forestland.

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

a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

The California Clean Air Act requires that areas that are designated as non-attainment of state ambient air quality standards for ozone, carbon monoxide, sulfur dioxide, and nitrogen dioxide must to prepare and implement plans to attain the standards by the earliest practicable date. The San Diego Air Basin (SDAB), in which the project site is located, is designated non-attainment for the state ozone standard. Accordingly, the Regional Air Quality Strategy (RAQS) was developed to identify feasible emission control measures and provide expeditious progress toward attaining the state standards for ozone. The two pollutants addressed in the RAQS are reactive organic gasses (ROG) and nitrogen oxides NOx), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and by extension to maintaining and improving air quality. The RAQS, in conjunction with the transportation control measures (TCMs), were most recently adopted in 2009 as the air quality plan for the region.

Growth projections are based on population, vehicle trends, and land use plans developed in general plans. As such, projects that propose development that is consistent with the growth anticipated by San Diego Association of Governments (SANDAG's) growth projections and/or a general plan would be consistent with the RAQS. In the event that a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.

The project site is located in the Linda Vista Community Plan and would be consistent with the Office-Commercial designation that allows residential uses. As such, the project would be consistent with the growth forecasts developed by SANDAG and used in the RAQS. Therefore, the project would not conflict with the goals and strategies in the RAQS or TCMs or obstruct their implementation and no impact would occur.

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

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

An Air Quality analysis was prepared by RECON Environmental Inc. (December 14, 2016). The analysis evaluated potential local and regional impacts to air quality due to construction and operation of the project and is summarized as follows.

Construction

Construction-related activities are temporary short-term sources of air emissions. Construction-related pollutants result from dust raised during demolition and grading, emissions from construction vehicles, and chemicals used during construction. Construction operations are subject to the requirements established in Regulation 4, Rules 52, 54, and 55, of the San Diego Air Pollution Control District's (SDAPCD) rules and regulations.

Construction emissions were modeled using California Emissions Estimator Model (CalEEMod) equipment and phasing estimations. Modeling assumptions are specified in the Air Quality analysis. Table 3 summarizes the worst-case project construction emissions. As shown, emissions would be less than the significance threshold for all criterion pollutants.

Table 3
Summary of Worst-case Construction Emissions
(pounds per day)

Phase	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition	3	31	25	0	4	2
Site Preparation	3	31	18	0	2	1
Grading/Excavation	3	30	20	0	8	5
Building Construction	5	29	32	0	4	2
Paving	2	17	13	0	1	1
Architectural Coatings	70	2	4	0	1	0
Maximum Daily Emissions	**70**	**31**	**32**	**0**	**8**	**5**
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*100*

Operation

Mobile source emissions would originate from traffic generated by the project. Area source emissions would result from activities such as the use of natural gas and consumer products. The project would result in 319 new residential units (including 6 commercial shopkeeper units) and removal of three office buildings for a net increase of 878 average daily trips (ADTs). Without the trip reductions associated with the demolition of existing office buildings, the project is calculated to generate 1,677 trips. The air quality analysis utilized the more conservative 1,677 trip generation estimate in calculating potential operational air emissions.

The addition of 319 residential units would not result in a substantial increase in pollutant emissions given the main source of emissions would be vehicular-related, and the amount of traffic generated by the residential units would not be substantial. Although the project would increase operational emissions generated at the site, the increase would not result in a significant impact on ambient air quality or a significant contribution to the existing air quality violation. Area source emissions

associated with the project include consumer products, architectural coatings, and landscaping equipment (no fireplaces are proposed) were also calculated as shown in Table 5; as summarized by Table 4, the combined emissions from all operation-related sources would be less than the significance threshold for all criterion pollutants.

Table 4
Summary of Project Operational Emissions
(pounds per day)

	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area Sources	9	0	26	0	0	0
Energy Sources	0	1	0	0	0	0
Mobile Sources	5	8	40	0	7	2
Total	**14**	**9**	**67**	**0**	**7**	**2**
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*100*
Note: Totals may vary due to independent rounding.						

As project construction and operational emission would not exceed applicable emission thresholds, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore impacts would be less than significant.

c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐

The region is classified as attainment for all criterion pollutants except ozone, 10-micron particulate matter (PM_{10}), and 2.5-micron particulate matter ($PM_{2.5}$). The SDAB is non-attainment for the 8-hour federal and state ozone standards. Ozone is not emitted directly, but is a result of atmospheric activity on precursors. NOx and ROG are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone. As summarized in Tables 4 and 5, emissions of ozone precursors (ROG and NOx), PM_{10}, and $PM_{2.5}$ from construction and operation would be below the applicable thresholds. Therefore, the project would not generate emissions in quantities that would result in an exceedance of National Air Quality Strategy (NAAQS) or California Air Quality Strategy (CAAQS) for ozone, PM_{10}, or $PM_{2.5}$, and impacts would be less than significant.

d)	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

A sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant than is the population at large and are associated with uses such as residences, schools, playgrounds, child care centers, churches, athletic facilities, retirement

homes, and long-term health care facilities. Sensitive receptors near the project site include adjacent residential uses.

Construction

Odors would be generated from diesel-powered vehicles and/or equipment exhaust emissions during construction of the project. Diesel exhaust would be noticeable temporarily at adjacent properties; such odors are temporary and would not occur at magnitudes that would not affect substantial numbers of people. The project does not include industrial or agricultural uses that are typically associated with objectionable odors. Therefore, impacts would be less than significant.

Operational

The project was evaluated for potential carbon monoxide (CO) hot spots. A hot spot is a localized area, most often near a congested intersection, where the 1-hour or 8-hour CO standards are exceeded. Localized CO impacts can occur where projects contribute traffic to intersections in areas where the ambient CO concentrations are projected to be near or above state or federal standards. As a worst-case analysis, the intersections with the greatest traffic volume and the greatest delay were modeled and the results of the modeling for these intersections are summarized in Table 5.

Table 5
Maximum CO Concentrations
(ppm)

	Operation Year (2018)			Cumulative (2035)			Standard CAAQS/NAAQS	
Roadway	Peak Hour Volume	1-Hour Conc.	8-Hour Conc.[1]	Peak Hour Volume	1-Hour Conc.	8-Hour Conc.[1]	1-Hour	8-Hour[1]
Friars Road at SR-163 southbound ramps	6,607	N/A	N/A	9,011	5.9	4.1	20/35	9.0/9
Friars Road at SR-163 northbound ramps	7,967	7.4	5.2	9,652	6.7	4.7		
Riverwalk Drive at Fashion Valley Road	1,198	N/A	N/A	3,700	4.7	3.3		

[1]8-hour concentrations developed based on a 0.7 persistence factor.

As shown in Table 6, the maximum 1-hour concentration would be 6.7 ppm. This concentration is below the federal and state 1-hour standards. In order to determine the 8-hour concentration, the 1-hour value was multiplied by a persistence factor of 0.7, as recommended in the CO Protocol. Based on this calculation, the maximum 8-hour concentration would be 4.7 ppm. Since increases of CO due to the project would be below the federal and state 8-hour standards, the project would not result in significant concentrations of CO at any local intersections; the impact would be less than significant.

Issue		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐

A field survey and a biological technical report was prepared by RECON Environmental, Inc. (September 6, 2016) to assess the vegetation communities on-site and identify impacts that would result through project implementation of the 5.94 acre site (5.43 onsite and 0.51 offsite). Vegetation communities observed onsite include 2.31 acres of Diegan coastal sage scrub (Tier II), 0.85 acre of disturbed Diegan coastal sage scrub (Tier II), 0.22 acre of Eucalyptus woodland (Tier IV), and 2.05 acres of Urban/developed lands. The project site does not contain wetlands. Although the project is within the City's Multiple Species Conservation (MSCP) Plan Subarea Plan, the project is not within or adjacent to lands identified as Multi-Habitat Planning (MHPA) area.

Two sensitive plant species were observed within the survey area, San Diego barrel cactus (*Ferocactus viridescens*) and San Diego viguiera (*Bahiopsis* [=*Viguiera*] *laciniata*). San Diego barrel cactus is a MSCP covered species and is considered a species rare, threatened, or endangered in California, but common elsewhere. This species was observed within the Diegan coastal sage scrub. Direct impacts to San Diego barrel cactus that would occur would be outside the MHPA and are permitted through the MSCP and not considered significant. San Diego viguiera is on the watch list of species of limited distribution, fairly threatened in California. This species was observed throughout the Diegan coastal sage scrub, and in lower numbers within the disturbed Diegan coastal sage scrub. Impacts to San Diego viguiera would not be considered significant as it is ranked as being a watch list species and not covered by the MSCP; nor does it have federal or state status, therefore impacts would be considered less then significant. No narrow endemic species were observed within the survey area.

One sensitive wildlife species, coastal California gnatcatcher (*Polioptila californica californica*), was observed in the survey area. Although not observed, there is moderate potential for Cooper's hawk (*Accipiter cooperii*), southern California rufous-crowned sparrow (*Aimophila rufuceps canescens*), and Beldings orange-throated whiptail (*Aspidoscelis hyperythra beldingi*) due to suitable habitats present for each species.

Wildlife corridors were not identified on-site. The survey area does not currently function as a significant wildlife movement corridor. It is located immediately north of Friars Road and bounded by residential development and roads, which immediately restrict its use by wildlife. Although the site may function for local wildlife movement, the site is not a significant MSCP regional corridor and does not provide a throughway for wildlife species into major areas of offsite habitats. While there may be some wildlife movement within the native habitats, the survey areas as a whole does not provide a major movement corridor for wildlife species.

Impacts to vegetation communities/land cover types from the project are listed in Table 6. The

project would result in impacts to Diegan coastal sage scrub (0.29 acre) and disturbed Diegan coastal sage scrub (0.63 acre), both Tier II vegetation types; eucalyptus woodland (0.19 acre), a Tier IV vegetation type; and urban/developed (2.39 acres). Per the City's Biology Guidelines, impacts to Diegan coastal sage scrub and disturbed Diegan coastal sage scrub are considered significant and would require mitigation. Mitigation for direct impacts to 0.92 Acres of Tier II habitat would be achieved through payment into the City's Habitat Acquisition Fund Conversely, impacts to eucalyptus woodland and urban/developed are not considered significant and would not require mitigation.

Outside of the development footprint, the remaining 2.38 acres of habitat (2.08 acres of Diegan coastal sage scrub and 0.30 acre of disturbed Diegan coastal sage scrub) would be conserved in a covenant of easement per Section 143.0152 of the City of San Diego Land Development Code. The easement would ensure the protection of the habitat.

Table 6
Impacts to Vegetation Communities and Land Cover Types
(acres)

Habitat and Land Cover Types	City of San Diego Tier	Survey Area	On-Site Impacts	Off-Site Impacts	Total Survey Area Impacts
Diegan coastal sage scrub	II	2.37	0.23	0.06	0.29
Disturbed Diegan coastal sage scrub	II	0.93	0.55	0.08	0.63
Eucalyptus woodland	IV	0.22	0.19	0.00	0.19
Urban/developed	-	2.42	2.02	0.37	2.39
TOTAL	**-**	**5.94**	**2.99**	**0.51**	**3.50**

Table 7
Mitigation Requirements for Impacts
(acres)

Vegetation Community (onsite and offsite)	Tier	Existing	Impact (outside MHPA)	Mitigation Ratio (inside MHPA / outside MHPA)	Total Mitigation Required
Diegan coastal sage scrub (includes disturbed coastal sage scrub)	II	3.30	0.92	1:1 / 1.5:1	0.92 / 1.38
Eucalyptus woodland	IV	0.22	0.19	--	0.00

Issue			Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Urban/developed	-	2.42	2.39	--	0.00	
TOTAL	**-**	**5.94**	**3.5**	**--**	**0.92 / 1.38**	

Note: Acreage does not include 0.31 acre of brush management zone (BMZ) 2 within Diegan coastal sage scrub occurring outside of the development footprint. BMZ 2 activities are considered impact neutral and do not require mitigation per the City's Biology Guidelines.

The project could potentially have indirect impacts on nesting raptors (i.e., Cooper's hawk) if tree removal or construction (grading) occurs during the typical bird-breeding season (February 1 through September 15). As a result, should grading or construction occur during the breeding season, a pre-construction survey for active nests would be required to ensure impacts to raptors would not occur. If the pre-construction survey detects nesting birds a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal law (i.e., appropriate follow-up surveys, monitoring schedules, construction, and noise barriers/buffers, etc.) would be required.

Therefore, a Mitigation Monitoring Reporting Program (MMRP), as detailed within Section V of the Mitigated Negative Declaration (MND), would be implemented. With implementation of the monitoring program, potential impacts on biological resources would be reduced to 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?	☐	☒	☐	☐

Refer to IV.a above.

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?	☐	☐	☐	☒

No federally protected wetlands are located on-site or within the off-site impact area. Thus, the project would have no impact on jurisdictional waters.

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?	☐	☐	☒	☐

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

The project area does not currently function as a significant wildlife movement corridor. The project site is located immediately north of Friars Road and bounded by residential development and roads, which ultimately restrict its use by wildlife. Although the site may allow for local wildlife movement, it is not a significant Multiple Species Conservation Plan regional corridor and does not provide a throughway for wildlife species into major areas of off-site habitats. Therefore, impacts would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

The project would not conflict with any local policies or ordinances protecting biological resources. The project would comply with the City's Biological Guidelines. Refer to Sections IV(a) – (d) and IV(f). There would be no impacts

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?	☐	☐	☐	☒

The project site is not located within or adjacent to any portion of the City's Multiple Species Conservation Plan (MSCP) preserve areas. Thus, no direct or indirect impacts to the MSCP Subarea Plan Preserve Areas would occur from the project and the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?	☐	☐	☒	☐

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.

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

Archaeological Resources

Many areas of San Diego County, including mesas and the coast, are known for intense and diverse prehistoric occupation and important archaeological and historical resources. Various cultural groups spanning 10,000 years or more have inhabited the region. The project area is located within an area identified as sensitive on the City of San Diego Historical Resources Sensitivity Maps. In addition, qualified City staff conducted a records search of the California Historic Resources Information System (CHRIS) digital database; the search identified several previously recorded historic and prehistoric sites in the project vicinity. Based on this information, there is a potential for buried cultural resources to be impacted through implementation of the project. Therefore, an archaeological resources survey report was completed by RECON Environmental, Inc. (October 27, 2015), which included literature review, record search, Native American Consultation, and completion of a pedestrian field survey (with a Native American Monitor) were conducted on the two parcels on July 17, 2015 per City requirements.

The majority of the site has either been developed or is dominated by extremely steep slopes. The survey was constrained by the built environment, the steepness of the canyon slopes, and vegetation. There was an attempt to survey the eastern parcel (APN 437-250-24), but because of the slope angle, combined with a hillside landform composed of round rock clasts and a vegetation community dominated by cacti, reconnaissance of this portion of the project area was limited. Due to the type of landform and its geologic structure, it is unlikely that subsurface archaeological materials would have been present.

The northwestern corner (APN 437-250-22) has a lesser gradient and a corresponding slightly higher potential to contain subsurface archaeological materials. This areas was surveyed to the extend possible. APN 437-250-23 is immediately backed by a historically cut slope face and could not be surveyed due to the steepness of the slope. Areas surrounding the existing buildings on all three parcels are dominated by hardscaping, providing no opportunity to identify subsurface materials. The results and conclusions of the technical report are summarized below.

Information retrieved as part of the literature review and record search revealed that one previously recorded prehistoric cultural resource to be mapped within the area of potential effect (APE). However, due to grading for road construction as well as realignment and widening, commercial developments, in addition to mining and agricultural practices have resulted in the loss of this resource. Additionally generous mapping techniques of the past likely erroneously placed site boundaries in areas where the site was not actually located, such as up and along the 30-foot degree slope face of the Linda Vista Terrace immediately north of the project site.

Because there is a low potential to encounter archaeological subsurface materials during ground-disturbing activities, no further work is necessary. No impact would result.

Built Environment

Historic property (built environment) surveys are required for properties which are 45 years of age or older and which have integrity of setting, location, design, materials, workmanship, feeling, and association. The existing structures on site proposed to be demolished were constructed in 1981 and do not meet the 45 years requirement. No impact would result.

Issue		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒

Refer to V.a above.

c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Fossils (paleontological resources) are the remains and/or traces of prehistoric life and represent an important and nonrenewable natural resource. Impacts to paleontological resources may occur during grading activities associated with project construction where excavation would be done in previously undisturbed geologic deposits/formations/rock units. According to the Geotechnical Investigation (Southern California Soil & Testing [SCST], Inc., October 15, 2014), the project area is underlain by Stadium Conglomerate. The Stadium Conglomerate formation is a sedimentary deposit that has a high paleontological resource sensitivity.

Per the City of San Diego's Significance Determination Thresholds, projects that involve more than 1,000 cubic yards of excavation and depth of 10 feet or greater within a high sensitivity area are considered to have a potentially significant impact on paleontological resources. In addition, monitoring would be required for shallow grading (less than 10 feet) when a site has either been previously graded and/or unweathered geologic deposits, formation, or rock units are present at the surface of the site.

The project would involve 106,000 cubic yards of cut and would excavate to a maximum depth of 91 feet. Considering the high paleontological sensitivity rating for underlying geology and that geologic formations were encountered in borings conducted during the geotechnical investigation (SCST Inc., 2014), the project grading activities have potential to disturb or destroy paleontological resources. Disturbance or loss of fossils would be considered a significant environmental impact.

Therefore, a Mitigation Monitoring Reporting Program (MMRP), as detailed within Section V of the Mitigated Negative Declaration (MND), would be implemented. With implementation of the monitoring program, potential impacts on paleontological resources would be reduced to less than significant.

d)	Disturb and human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒

The site is currently developed and was modified in the past by the existing development with fill occupying the underlying surface material. In the unlikely event remains are located, the project would comply with the Public Resources Code requirements for handling remains. Thus, no impacts to human remains would 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:

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

Based on the California Geological Survey, an active fault is defined by evidence of activity within the last 11,000 years. The geotechnical report (SCST Inc., October 15, 2014) prepared for the project indicates that the site is not located in an Alquist-Priolo Earthquake Fault Zone and no active faults are known to underlie the project; thus, the probability of fault rupture is negligible and impacts associated with fault rupture would be less than significant.

ii)	Strong seismic ground shaking?	☐	☐	☒	☐

The project site is in a seismically active region and may be subject to moderate to severe ground shaking in response to a major earthquake. As described in the project geotechnical report the nearest known active fault is the Rose Canyon fault zone (San Diego section) located about 1.7 miles (2.8 kilometers) west-southwest of the site. Seismic design of the structures, in accordance with the California Building Code, would ensure that the potential for impacts from regional seismic events would be less than significant.

iii)	Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

As described in the project geotechnical report liquefaction occurs when loose, saturated, generally fine sands and silts are subjected to strong ground shaking and soils lose shear strength and become liquid; resulting in ground surface settlements and lateral spreading during an earthquake. Given the relatively dense nature of the materials beneath the site, the potential for liquefaction and dynamic settlement to occur is negligible. Thus, impacts related to ground failure and liquefaction would be less than significant.

iv)	Landslides?	☐	☐	☐	☒

A surficial slope stability analysis was completed for the project site to evaluate the stability of the existing natural slopes at the north side of the project site (SCST Inc., February 17, 2014). The analysis indicates that the proposed design including installation of soil nails at the north side of the project site against the base of the slope, would achieve an adequate safety factor and potential impacts related to slope stability would be less than significant.

b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

The project would provide soil stabilization for portions of on- and off-site slopes that are currently

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

subject to erosion With implementation of project landscaping and management of storm water as discussed in Section IX.c, the project would result in a less than significant impact related to the loss of topsoil and erosion.

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?	☐	☐	☒	☐

The project site is located within geologic hazard zones 32 and 52 as shown on the City's Seismic Safety Study Geologic Hazards Maps. Zone 32 is characterized by low potential for liquefaction, fluctuating groundwater, with minor drainages. Zone 52 is characterized by other level areas, gently sloping to steep terrain with favorable geologic structure and low risk.

The geotechnical investigation indicates that the risk of lateral spreading during a seismic event is negligible. Implementation of the project would not result in landslide, lateral spreading, subsidence, liquefaction, or collapse. All potential impacts related to unstable geology or soil would be less than significant.

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?	☐	☐	☒	☐

As detailed in the geotechnical investigation, the project is not located on expansive soils. Soil borings taken on–site encountered clayey gravel and conglomerate materials. The expansion index of these materials is 39 and 1, respectively. An expansion index of 39 is low while an expansion index of 1 is very low as defined by the 2013 California Building Code (CBC) Section 1803.5.3. Thus, the project would have a less than significant impact related to expansive soils.

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?	☐	☐	☐	☒

The project site is in an area that is already developed with existing infrastructure (i.e., water and sewer lines) and it would not require a septic system. Thus, the project would have no impact related to septic tanks or alternative waste water disposal systems.

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?	☐	☐	☒	☐

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

The City's Climate Action Plan (CAP) outlines the actions that the City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions. A CAP Consistency Checklist (Checklist) is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emission targets identified in the CAP are achieved. 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.

Based on the project's consistency with the City's CAP Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project's direct and cumulative GHG emissions would have a less than significant impact on the environment.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

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.

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?	☐	☐	☒	☐

The project does not propose any use that would involve the routine transport, use, or disposal of significant hazardous materials. The project construction and operational maintenance activities may involve small amounts of solvents, cleaners, paint, oils and fuel for equipment, and pesticides/herbicides. There are adequate regulations in place to protect public safety, including the Clean Air Act, Clean Water Act, Comprehensive Environmental Response, Compensation and Liability Act, and the Toxic Substances Control Act. At the local level, the City Fire Department and County of San Diego (County) Health Department screens inventories and inspects sites permitted to use or store hazardous materials regularly. The County also reviews Hazardous Materials Business Plans and the Air Pollution Control District regulates projects with possible toxic emissions. Given the application of these regulations, the project would have a less than significant risk to the public related to hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably	☐	☐	☒	☐

Issue		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				

Refer to response VIII a., above. The project would have no impact associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

The site is not within 0.25 mile of an existing school. Additionally, project construction and operations would not result in the emission of hazardous materials that could affect sensitive receptors. The project would have no impact related to hazardous material emissions near a school.

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?	☐	☐	☒	☐

A search of potential hazardous materials sites compiled pursuant to Government Code Section 65962.5 was completed for the project site. Several databases and resources were consulted including the Department of Toxic Substances Control (DTSC) EnviroStor database, the California State Water Resources Control Board GeoTracker database, and other sources of potential hazardous materials sites available on the California EPA website. The Geotracker record search identified four cases were reported for remediation; however the cases were closed and the database identified they no longer represent a threat to human health or safety. No other hazardous materials sites were identified on-site. Thus, no hazard to the public or environment would result from project implementation.

e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two mile of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐

The project site is within the Airport Land Use Plan and Airport Influence Area (Review Area 2 – airspace protection and overflight boundaries) for San Diego International Airport as depicted in the adopted Airport Land Use Compatibility Plan (ALUCP; 2014). Per the ALUCP, only airspace protection and overflight policies and standards apply within Review Area 2. The proposed maximum height would be approximately 103 feet and would not exceed the Federal Aviation Authority (FAA) Part 77 height criteria of 200 feet above ground level. The project applicant has submitted the required FAA

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

Self Certification Agreement. Thus, potential safety hazards for people residing or working in the project area would be less than significant.

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?	☐	☐	☐	☒

The project site is not in proximity to any private airstrip. There would be no impact.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

The project would not negatively impact an adopted emergency response plan or evacuation plan as construction equipment staging areas would be restricted to on-site locations, and public roadways would not be impeded by construction operations. The project would be constructed on an existing developed site and operations would not affect existing traffic flow through Friars Road. Thus, there would be a less than significant impact related to emergency response and evacuation plans.

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?	☐	☐	☒	☐

Brush management is required for development that is adjacent to any highly flammable area of native or naturalized vegetation. Brush management is a comprehensive program required to reduce fire hazards around all structures by providing an effective firebreak between structures and contiguous area of flammable vegetation. The firebreak is required to consist of two distinct brush management zones (BMZs): a 35-foot-wide BMZ-1 and a 65-foot-wide BMZ-2, which are required per the Land Development Code (LDC). Per the LDC Section 142.0412(i), the Fire Chief may modify the requirements of this section if the following conditions exist:

- The modification to the requirement shall achieve an equivalent level of fire protection as provided by this section, other regulations of the LDC, and the minimum standards contained in the Land Development manual; and
- The modification to the requirements is not detrimental to the public welfare of persons residing or working in the area.

Because of the constraints inherent to the site, the applicant would be providing a modified brush management program. The BMZ-1 would be located between the proposed buildings and the retaining wall which would be located on the sloped (northern) portion of the site. In most cases, BMZ-2 would run from the top of the retaining wall to the property line. The reduction/modification of the brush management zones would not increase hazards to either of the structures from

external fires nor would it increase hazards to adjacent properties. The building would be sprinklered and the windows which face to the north (the sloped side) would be required to be dual glazed/dual tempered which would allow comparable fire safety as full-width brush management zones in the prevention of building ignition from wildfires originating away from the site. All structures would have fire resistance construction per Chapter 7A of the California Building Code.

Both the City's Landscape and Fire Review Sections have reviewed the modified brush management compliance and concluded that it adequately addresses the fire safety potentially affecting the project site. The project and the above-described project features have been designed in accordance with the City's Landscape Regulations. Compliance with the standards through the above project elements would result in less than significant impacts to human health and public safety.

IX. HYDROLOGY AND WATER QUALITY - Would the project:

a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐

According to the City of San Diego's Storm Water Requirements Applicability Checklist, the project was identified as a "priority" project and therefore was required to prepare a project-specific storm water quality management plan; the technical study was prepared by Latitude 33 Planning and Engineering (September 13, 2016). This project site lies within the Lower San Diego Hydrologic Area (907.1) located in the San Diego River Watershed. Lower San Diego River is included on the EPA 303(d) list and is listed as impaired for enterococcus, fecal coliform, low dissolved oxygen, manganese, nitrogen, phosphorus, total dissolved solids, and toxicity. Based on these impairments, the primary pollutants of concern for the proposed development are nutrients, trash, oxygen demanding substances, pesticides, and organic compounds. The project would not directly discharge runoff into a 303(d) listed water body.

The project would comply with the City's Stormwater Management and Discharge Control Ordinance (Municipal Code Chapter 4, Article 3, Division 3), Storm Water Runoff and Drainage Regulations (Land Development Code §142.02 et al.), and other applicable storm water quality standards during and after construction. Treatment control BMP's have been selected that would ensure pollutants are not discharged to receiving waters. Proposed BMPs as fully described in the storm water quality management plan are summarized below.

The project would employ site design, source control and treatment control BMPs. Site design BMPs include maintenance of existing drainage patterns, preservation of natural areas and vegetation along steep slopes, minimizing the building footprint, and directing runoff to landscaped areas where feasible. Source control BMPs are site planning practices or structures that aim to prevent urban runoff pollution by reducing the potential for contamination at the source. Source control BMPs include providing storm drain stenciling/ signage and covering outdoor trash storage areas. The project would include treatment control BMPs that were selected based on their ability to remove the project's primary pollutants of concern (biofiltration basins).

These requirements have been reviewed by qualified City staff and would be re-verified during the

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

ministerial process. Adherence with the standards would preclude a cumulatively considerable contribution to water quality; therefore impacts would be a less than significant.

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)?	☐	☐	☒	☐

The project would not use groundwater for any purpose, as all water would be obtained from the municipal supply. The project site is currently developed and contains impervious surfaces. Redevelopment of the project site would not substantially interfere with groundwater recharge since development would occur on an existing developed site.

Additionally, since the groundwater table is high at the project location due to the proximity to the San Diego River, an Addendum Geotechnical Report (prepared by SCST Inc., September 9, 2016) was requested to further discuss the proposed BMP facilities (biofiltration basins). The report states that the proposed biofiltration basins are strategically located in areas where groundwater was not encountered. To reduce any potential for adverse impacts to adjacent structures/improvements from groundwater migration, cutoff walls or vertical cutoff membranes would be installed along the sides of the BMPs as well as a sub-drain to be placed at the bottom of the biofiltration basins that connect to a storm drain facility. Therefore, impacts would be less than significant.

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?	☐	☐	☒	☐

This section is based on a Preliminary Drainage Study prepared for the project by Latitude 33 Planning and Engineering (September 13, 2016). The existing site generally slopes from west to east. Runoff from the site congregates in the southeast corner of the property where it enters the public storm drain system in Friars Road. The public storm drain is a 30-inch pipe, which runs south through Fashion Valley Mall to the San Diego River. Runoff from undeveloped areas north of the site enters the site and is conveyed through the site via a concrete drainage ditch. The public storm drain is a stabilized conveyance system from the project site directly to the San Diego River. There is no stream or other native channel that the runoff enters prior to discharging into the San Diego River.

In the proposed condition, drainage patterns for the site would not vary greatly from the existing drainage patterns. Implementation of water quality devices as discussed in the project storm water quality management plan would capture and treat runoff before discharging to the 30-inch public storm drain within Friars Road would represent a positive change.

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

The steep hillsides to the north of the project site would continue to contribute runoff to the project site. This runoff would be captured in a concrete ditch behind the proposed soil nail retaining wall, collected within two proposed public catch basins on the east and west ends of the wall. These catch basins would be installed within the existing public storm drain that connects to Friars Road. Additional runoff from the steep hillsides on the easternmost portion of the site that would remain undeveloped would continue to be captured in existing concrete ditches and piped directly to the public storm drain system. All runoff collected on the roofs of the two residential towers and the podium deck of the parking structure would be conveyed by roof drains and area drains to the bottom level of the parking structure where the runoff would be treated by two biofiltration basins located between the proposed buildings and the Friars Road right-of-way. Once the runoff has been treated it would outlet to a private storm drainpipe that would connect to the existing public storm drain system in Friars Road. Runoff from the driveways, public sidewalk, parkway, and newly widened portions of Friars Road would be collected by storm drain inlets located at two points along Friars Road which would implement green streets and be captured in biofiltration basins. This runoff would be conveyed via newly constructed public storm drain that would connect to the existing public storm drain system within Friars Road. All runoff from the project site would ultimately enter the existing inlet at the east side of Lot 2. This inlet connects to the public storm drain system within Friars Road that is piped east in Friars Road, then turns south through the Fashion Valley Mall before discharging directly into the San Diego River.

The redevelopment of the site would result in a decrease in peak runoff volumes and flow rates for the 100-year peak discharge volumes by 0.45 cubic feet per second (cfs). The drainage system is designed to control flows and associated velocities to prevent erosion and impacts to the downstream conveyance system as previously described. Therefore, the impact on drainage patterns would be less than significant.

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?	☐	☐	☒	☐

The project would retain the existing drainage pattern as detailed in IV.c above. Runoff would continue to be conveyed to Friars Road. As discussed above, the proposed drainage improvements would result in a reduction in runoff discharge rates. Thus, the project would not result in downstream flooding issues. Impacts would be less than significant

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?	☐	☐	☒	☐

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

The project would comply with all City and Regional Water Quality Control Board (RWQCB) storm water quality standards during construction and operation. The project would include construction and operational BMPs to maintain water quality (see IX.a). The project would also include the necessary storm drain system improvements to accommodate flows from the project site. Thus, project impacts associated with runoff would be less than significant.

f)	Otherwise substantially degrade water quality?	☐	☐	☒	☐

The project would comply with all storm water quality standards during construction and after construction and appropriate BMPs (refer to IX(a)) would be implemented. Thus, water quality impacts would be less than significant.

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?	☐	☐	☐	☒

The property is not located within a 100-year flood hazard area. Thus, the project would not place housing within the 100-year floodplain and there would be no impact.

h)	Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?	☐	☐	☐	☒

The property is not located within a 100-year flood hazard area. Thus, the project would not impede or redirect flows within a 100-year flood hazard area and no impact would occur.

X. LAND USE AND PLANNING – Would the project:

a)	Physically divide an established community?	☐	☐	☐	☒

The existing site is developed with professional office and parking uses with access from the adjacent Friars Road. The project would redevelop the site and access would be provided from existing roads. The project site is located in an area surrounded by existing development. The proposed mixed-use apartment building and condominium tower would not physically divide the community because the project does not involve the introduction of new infrastructure such as a major roadway or any other project element that would result in a physical division of land uses in the area. Thus, no impact would occur.

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	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
effect?				

The Linda Vista Community Pan designates the project site as Commercial Office. The Community Plan further states that the construction of residential in areas designated for commercial use should be permitted above the ground floor. The underlying base zone is CO-1-2 that allows for a density of 1,500 square feet of lot area per unit or a 157 dwelling unit maximum.

Pursuant to San Diego Municipal Code §131.0540(b), residential development is permitted only when a commercial structure exists on the premises or is a part of the proposed development. As the project includes a commercial component on the ground floor level of the project, consisting of six shopkeeper units with direct access from Friars Road, the project would comply with this requirement, therefore making the project consistent with the community plan.

As described in the Project Description, the project is proposing 313 (243 apartments and 70 condominiums) multi-family units with commercial space on the ground level consisting of 6 commercial shopkeeper units, for a total of 319 units, which exceeds the allowable density of the underlying zone. Therefore, the project is requesting additional density through a Planned Development Permit in accordance with San Diego Municipal Code §143.0410(a)(3)(D), which permits a residential component as part of a mixed-use (commercial/residential) project and the applicable land use plan establishes a higher density than the base zone. As the project is a mixed-use project incorporating commercial uses on the ground level and the Linda Vista Community Plan establishes a higher density than the base zone, the proposed 319 residential dwelling units would be consistent with applicable land use plans as well as the underlying zone.

The Land Development Code, Section 126.0604(a), allows a project in the Affordable/In-Fill Housing and Sustainable Buildings to request deviations from applicable development regulations in accordance with a Process 4 Planned Development Permit. Deviations requested by the project include the following (and shown in Table 8):

1. Front Yard Setback: A deviation from San Diego Municipal Code Section 131.0531, Table 131-05D requires a minimum front setback of 10 feet on lots 2 and 3 per/in the CO-1-2 zone. The project proposes a minimum front setback of 6 feet for Lots 2 and 3.

2. Rear Yard Setback: A deviation from San Diego Municipal Code Section 131.0531, Table 131-05D and 131.0543(b) requires a minimum rear setback of 10 feet and zero feet is the optional rear setback per/in the CO-1-2 zone. The project proposes a minimum rear setback of zero and 10 feet where there is a diagonal line connecting the two point on Lot 2.

3. Retaining Wall Height: A deviation from San Diego Municipal Code Section 142.0340 requires a maximum wall height of 6 feet. The project proposes a retaining wall height of 88 feet on Lot 2 and 91 feet on Lot 3.

4. Structure Height: A deviation from San Diego Municipal Code Section 131.0531, Table 131-05D requires a maximum structure height of 60 feet per/in the CO-1-2 zone. The project proposes a maximum structure height of 124.2 for building on Lot

2 and 103.6 feet for the building on Lot 3.

5. Floor Area Ratio: A deviation from San Diego Municipal Code Section 131.0531, Table 131-05D requires a maximum floor area ratio of 1.50 per/in the CO-1-2 zone. The project proposes a maximum floor area ratio of 1.58.

6. Ground Floor Residential: A deviation from San Diego Municipal Code Section 131.0540(a)(1) prohibits residential uses and residential parking on the ground floor in the front 50 percent of the lot. The project proposes residential in the front 50 percent of the lot with the commercial shopkeeper units.

Table 8
Required Deviations

	CO-1-2 Zone	Proposed
Front Setback	10′	6′ on Lots 2 and 3
Minimum Rear Setback	10′	0′ on Lot 2
Maximum Retaining Wall Height	6′	88′ on Lot 2 and 91′ on Lot 3
Maximum Structure Height	60′	103.6 for building on Lot 3 and 124.2 for buildings on Lot 2
Maximum Floor Area Ratio	1.5	1.58
Ground Floor Residential	Not Allowed in front 50% of lot	Proposed in front 50%

The project is situated along Friars Road on parcels that include steep slopes adjacent to open space areas. As stated in the Linda Vista Community Plan Vision Statement, scenic resources, such as the slopes above Mission Valley, should be maintained. The General Plan Urban Design Element contains the policy, "Development located on hillside parcels should be sensitive to the natural terrain to preserve and enhance views, and protect areas of unique topography" (General Plan UD-A.3). General Plan Urban Design Element Policy UD-A.5 states that buildings are to be designed to contribute to a positive neighborhood character. While the project would disturb slopes greater than 25 percent, those slopes have been determined to be cut slopes, which were disturbed as part of the previous commercial project constructed in the 1970s. In addition, architectural variation and landscape interest would be incorporated into the project to provide visual appeal to the streetscape and enhance the pedestrian experience.

In summary, construction of the project would occur within an urbanized neighborhood with similar development. Furthermore, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, community plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. No Impact would result.

Issue		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

The project would not conflict with any applicable habitat conservation plan or natural community conservation plan. More specifically, the site and surrounding land is not in a designated preserve area outlined in the City's Multiple Species Conservation Plan Subarea Plan. The site is not in or adjacent to Multi-Habitat Planning Area lands. Therefore, no impact would result.

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?	☐	☐	☐	☒

There are no known mineral resources on the project site. The site and surrounding lands are located in a developed commercial and residential area that would be unsuitable for mining. There would be no impact.

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?	☐	☐	☐	☒

The City's General Plan does not identify the project site as being within a mineral resource zone. There would be no impact.

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?	☐	☐	☒	☐

Noise is defined as any sound that is undesirable or interferes with normal hearing processes. Projects are reviewed for noise generation, which could impact adjacent sensitive receptors and noise exposure from existing sources. All residential (single and multi-dwelling), schools, libraries, hospitals, daycare, convalescent homes, hotels, motels, and parks are uses that are considered sensitive receptors. In order to determine what if any impacts would result a project-specific noise technical report was prepared by RECON Environmental, Inc. (December 14, 2016).

Short-Term (construction)
Construction of the project would generate noise. Noise associated with the removal of the structures, grading, and construction could potentially result in short-term noise impacts to surrounding residential properties. A variety of noise-generating equipment would be used during the construction phase of the project such as scrapers, backhoes, front-end loaders, and concrete saws, among others.

While noise from temporary construction activities may be heard over other noise sources in the

area, noise would be temporary and would not exceed 75 dB(A) L_{eq} (A-weighted decibels equivalent noise level) averaged over a 12-hour period based on typical noise generation of construction equipment and the distance to the nearest residential use. Additionally, construction would be prohibited between the hours of 7 p.m. and 7 a.m., Sundays, and legal holidays. Noise control measures would include maintaining construction equipment in proper working condition, and placing staging equipment away from sensitive noise receptors. The City of San Diego Noise Abatement and Control Ordinance of the Municipal Code, Section 59.5.0404, limit for construction activities is 75 dB(A) L_{eq} averaged over a 12-hour period. The project would be required to comply with the City Noise Ordinance, and construction noise impacts would be less than significant.

Traffic Noise (onsite)

Per the City of San Diego Noise Element, noise impacts at outdoor use areas for multi-family residences shall not exceed 65 community noise equivalent level (CNEL). To evaluate noise levels with the addition of project traffic, noise level contours were developed using the SoundPLAN program. Noise level contours, modeled at the first floor level where the exterior use areas and first floor of residential units would be located. These contours took into account topography, the proposed buildings, and a 3.5-foot solid wall that would run along the southern edge of the pool decks.

Exterior noise levels considering future traffic noise were calculated at a series of 35 modeled receiver locations including at the building façade, the two first floor pool areas, the open space on the north side of the apartment building, and the rooftop deck of the condominium building. According to the noise study, traffic noise levels at the common exterior use areas would be below 63 CNEL, which is below the 65 CNEL multi-family threshold for outdoor use areas.

The interior noise level standard for residential uses is 45 CNEL. As detailed in the noise report, exterior noise levels would exceed 60 CNEL at the façade of the apartment and condominium structures except at the north side of the proposed buildings that are shielded from Friars Road. Exterior noise levels would range up to 73 CNEL at the apartment building and 74 at the condominium building façade. As required by Title 24, where exterior noise levels exceed 60 CNEL, interior noise studies shall be prepared to demonstrate noise levels due to exterior sources do not exceed 45 CNEL in habitable rooms. With implementation of typical design features addressing interior noise (mechanical ventilation, wall and windows with a minimum sound transmission class rating), the project would meet interior noise standards. Thus, the project would not result in exposure to significant noise in noise in excess of applicable standards.

Traffic Noise (offsite)

The project would increase traffic volumes on local roadways. A significant impact would occur if the project would result in or created a significant increase in the existing ambient noise levels. Per the City's Significance Determination Thresholds state that is a project is currently at or exceeds the significance thresholds for traffic noise and noise levels result in less than a 3 dB(A) increase, the impact would not be considered significant.

The increase in noise due to the addition of the project traffic was calculated by comparing the existing and future traffic volumes with and without the project. As calculated, noise increases would be range from 0.6 to 2.2 dB. These increases would not be perceivable and impacts would be

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

considered less than significant.

On-Site Generated Noise (Stationary Noise)
The noise sources on the project site after construction are anticipated to be those that would be typical of any residential complex, such as vehicles arriving and leaving, children at play, and landscape maintenance machinery.

The Municipal Code Section 59.5.0401 residential property line noise limit is 50 decibels (dB) between 7 a.m. to 7 p.m., 45 dB between 7 p.m. and 10 p.m., and 40 dB between 10 p.m. and 7 a.m. As parking would be located within the proposed structure, the project would not generate noise from surface parking lots. Other on-site noise sources would include rooftop heating, ventilating and air conditioning (HVAC) equipment. None of these noise sources are anticipated to violate the noise level limits of the municipal code or result in a substantial permanent increase in existing noise levels. HVAC units would be located within mechanical equipment enclosures located on the roof of each building. The equipment enclosures would attenuate noise and would ensure stationary noise from HVAC units would not generate noise levels in excess of the noise level limits of the municipal code. Thus, impacts due to on-site generated noise would be less than significant.

In conclusion, the project would not result in the exposure of persons, or generation of noise levels in excess of standards established, therefore impacts would be less then significant.

b) Generation of, excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐

The project may expose people to groundborne vibrations or noise levels during construction. However, these would be temporary impacts associated with heavy-duty construction equipment. This temporary impact would be considered less than significant because construction would be prohibited during evening hours (7:00 p.m. to 7:00 a.m.) in accordance with City of San Diego requirements. In addition, vibration-inducing construction equipment such as a pile driver would not be used. Refer also to XIII.a above. Thus, impacts related to ground borne vibration or noise would be less than significant.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐

The project would increase traffic volumes on local roadways; however, noise increases would be 2.2 dB or less, which is not an audible noise increase. Thus, impacts related to traffic noise would be less than significant.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?	☐	☐	☒	☐

Refer to the analysis under XII.c. Impacts would be less than significant.

Issue		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

The project site is located approximately 2.5 miles northeast of the San Diego International Airport. According to the San Diego International Airport ALUCP noise contour map, the project area is located outside of the 60 dB or greater contours. Future residential structures would not be exposed to excessive exterior noise from airport noise. Additionally, to ensure that interior noise levels are less than 45 dB, the project would use insulation and noise reducing building materials in accordance with building code requirements. Thus, impacts related to airport noise would be less than significant.

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?	☐	☐	☐	☒

The project site is not located within the vicinity of a private airstrip. No impact would occur.

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)?	☐	☐	☒	☐

The project would develop 243 apartments (160 one-bedroom units and 83 two-bedroom units), 6 shopkeeper units (one-bedroom units with in-unit commercial space), and 70 condominium units (34 one-bedroom units and 36 two-bedroom units). The projected population of the project would be approximately 324 new residents, assuming each unit would have one additional resident per number of bedrooms provided (i.e., 2 residents for each one-bedroom unit, and 3 residents for each two-bedroom unit). The proposed project would not induce substantial population growth because it is an infill project and would not require the extension of roads or infrastructure. Impacts would be less then significant.

b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

The project site is developed with existing commercial uses that would be demolished. The site does not support any housing. Thus, no housing or people would be displaced.

c)	Displace substantial numbers of people, necessitating the construction of	☐	☐	☐	☒

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

replacement housing elsewhere?

See XIII.b.

XIV. PUBLIC SERVICES

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

i) Fire Protection ☐ ☐ ☒ ☐

The project site is within the service area of Fire Station 23 located at 2190 Comstock Street in the Linda Vista Community Plan area. Additionally, there are several other fire stations in proximity to the project site that could respond to calls for emergency service as shown in Table 9.

Table 9
Project Area Fire Stations

Fire Station	Station Address	Approximate Distance to Project Site (miles)
Station 23	2190 Comstock Street	2
Station 25	1972 Chicago Street	3.2
Station 45	Qualcomm Stadium Parking Lot	3.6
Station 5	3902 9th Avenue	2.5
Station 8	3974 Goldfinch Street	2.3

Although the project would result in additional residential units consistent with the community plan, the project would not result in a measurable adverse effect on fire response times due to the project's infill location and the minimal increase in demand for fire service that the proposed number of residences would generate. Additionally, the project would be required to pay the development impact fees at the time of building permit issuance.

As the project would not adversely affect existing levels of fire protection services or creates a significant new demand and would not require the construction of a new or expansion of an existing facility. Impacts related to fire protection would be less than significant, and no mitigation measures are required.

ii) Police Protection ☐ ☐ ☒ ☐

The Western Area Police Substation at 1222 Gaines Street provides police protection, within the Mission Valley Community planning area. Although the project would result in additional residential units consistent with the community plan, the project would not result in a measurable adverse effect on police response times due to the project's infill location and the minimal increase in demand for police service that the proposed number of residences would generate. Additionally, the project would be required to pay the development impact fees at the time of building permit issuance.

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

As the project would not adversely affect existing levels of police protection services or creates a significant new demand and would not require the construction of a new or expansion of an existing facility. Impacts related to police protection would be less than significant, and no mitigation measures are required.

iii) Schools	☐	☐	☒	☐

The project would provide 319 residential units that would potentially serve families with school-age children. The most likely schools to serve the project site would be in Linda Vista, including Carson Elementary School located at 6905 Kramer Street, Montgomery Middle School located at 2470 Ulric Street, and Kearny Complex High School located at 7651 Wellington Street. These schools are within the San Diego Unified School District (SDUSD).

The SDUSD provides opportunities for students to attend schools within their residential neighborhoods, as well as opportunities to attend schools in educational settings outside their identified attendance boundaries (Choice Program). Capacity at SDUSD schools would be sufficient to accommodate the project's projected student population based on the current Choice Program and future enrollment studies prepared by the SDUSD.

Pursuant to Government Code Section 65995 et seq., the project proponent would be required to pay applicable school fees before a construction permit is issuance. With payment of statutory school fees, adverse impacts to school facilities would be avoided and no new school facilities would be required to accommodate the project.

Thus, the project would not adversely affect schools or create a significant new demand and would not require the construction of a new or expansion of an existing facility. Additionally, as stated previously the project would be required to pay developer fees for school facilities construction that would reduce impacts to schools to less than significant levels.

v) Parks	☐	☐	☒	☐

The project site is located in an urbanized and developed area where City-operated parks are available. The project would not significantly increase the demand on existing neighborhood or regional parks or other recreational facilities over that which presently exists, the project would is not anticipated to result in a significant increase in demand for parks or other offsite recreational facilities. Additionally, the project would be required to pay the development impact fees at the time of building permit issuance.

As the project would not adversely affect existing facilities or creates a significant new demand and would not require the construction of a new or expansion of an existing facility. Impacts related to parks would be less than significant, and no mitigation measures are required.

vi) Other public facilities	☐	☐	☒	☐

Although the project would result in additional residential units consistent with the community plan,

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

the project site is located in an urbanized and developed area where City services are already available. The project would not adversely affect existing levels of public facilities and would not require the construction or expansion of an existing public facility. Impacts related to other public facilities would be less than significant.

As the project would not adversely affect existing facilities or creates a significant new demand and would not require the construction of a new or expansion of an existing facility. Impacts related to parks would be less than significant, and no mitigation measures are required.

XV. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

Refer to XIV(a)(v). The project would not adversely affect existing levels of neighborhood and regional parks and would not require the construction or expansion of those facilities. The project would not significantly increase the use of existing neighborhood or regional parks or other recreational facilities as the project would consistent with applicable land use plans and underlying zone designations with allowable deviations. Furthermore, the project would be required to pay development impact fees associated with the development. Therefore, the project is not anticipated to result in the use of available parks or facilities such that substantial deterioration occurs, or that would require the construction or expansion of recreational facilities to satisfy demand. As such, a less than significant impact related to recreational facilities would result.

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?	☐	☐	☒	☐

Refer to XV.a. The project would not adversely affect existing levels of recreational facilities and would not require the construction or expansion of those existing facilities. The project would not significantly increase the use of existing neighborhood or regional parks or other recreational facilities, as the project would be consistent with applicable land use plans and underlying zone designations. Furthermore, the project would be required to pay development impact fees associated with the development. Therefore, the project is not anticipated to result in the use of available recreational facilities such that substantial deterioration occurs, or that would require the construction or expansion of recreational facilities to satisfy demand. As such, no significant impacts related to recreational facilities would be less than significant.

XVI. TRANSPORTATION/TRAFFIC – Would the project?

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system,	☐	☐	☒	☐

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

A Transportation Impact Analysis (TIA) was completed for the project by Linscott Law and Greenspan, Engineers (LLG) (October 25, 2016), the results of which are summarized below.

Vehicle Trip Generation and Distribution

Since the project site is located within 1,500 feet from the Fashion Valley Transit Station, transit credits and applicable mixed-use credits were applied to both the existing office use and the proposed residential land uses when calculating trip generation. In addition, per the City's Impact Study Manual, the project is allowed to apply an existing land use credit because the existing office buildings on the project site, which are proposed to be replaced with the project, generate approximately 799 average daily traffic (ADT) with 87 inbound and 12 outbound trips during the AM peak hour and 24 inbound and 87 outbound trips during the PM peak hour.

Before applying the existing land use trip generation credit, the project is calculated to generate a gross total of 1,677 ADT with 26 inbound and 103 outbound trips during the AM peak hour and 104 inbound and 45 outbound trips during the PM peak hour. With the existing land use trip generation credit, the project is calculated to generate a net total of 878 ADT with 61 fewer inbound trips and 91 additional outbound trips during the AM peak hour, 80 additional inbound trips during the PM peak hour, and 42 fewer outbound trips during the PM peak hour. The project would result in fewer AM inbound and PM outbound peak hour volumes because the reduction in traffic from the removal of the existing uses is greater than the new traffic associated with the proposed multi-family residential use for those time periods and directions of travel. This is due to the traffic patterns associated with the different land uses; for example, residential uses typically generate heavy AM outbound volumes while office uses typically generate heavy AM inbound volumes.

Study Area

Based on the City's guidelines, the project's study area included seven intersections and six street segments.

Intersections:

- Friars Road/Fashion Valley Road
- Friars Road/Via de la Moda
- Friars Road/Avenida de las Tiendas (Private Driveway)
- Friars Road/SR-163 Southbound Ramps
- Ulric Street/SR-163 Southbound On-Ramp
- Friars Road/SR-163 Northbound Ramps
- Riverwalk Drive/Fashion Valley Road

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

Street Segments:

- Friars Road: West of Fashion Valley Road
- Friars Road: Fashion Valley Road to Via de la Moda
- Friars Road: Via de la Moda to Avenida de las Tiendas (Private Driveway)
- Friars Road: Avenida de las Tiendas (Private Driveway) to Avenida Del Rio (Private Driveway)
- Friars Road: Avenida Del Rio (Private Driveway) to Ulric Street
- Fashion Valley Road: Friars Road to Riverwalk Drive

Six conditions were evaluated:

- Existing
- Existing + Project
- Near Term (Opening Day 2018)
- Near Term (Opening Day 2018) + Project
- Year 2035 (Horizon Year)
- Year 2035 (Horizon Year) + Project

Thresholds

City CEQA Significance Thresholds identify a significant impact would occur where roadway segments would operate at level of service (LOS) E or F and the project increase to the volume to capacity ratio (V/C) is greater than 0.02 at LOS E, or 0.01 at LOS F. With respect to study area intersections, a significant impact would occur where the project would cause an increase in peak hour delay of more than 2.0 seconds at LOS E or more than 1.0 second at LOS F.

Impacts

The analysis in the TIA shows that under all conditions evaluated, there would be no significant direct or cumulative impacts due to the project for either roadway segments or intersections under any of the six conditions analyzed. However, in order to provide adequate access to the project site, and be consistent with the Mission Valley Community Plan; the project shall be conditioned to construct frontage improvements. These improvements are discussed in detail within the project description and include constructing the north leg of the Friars Road / Via De La Moda intersection and widening Friars Road along the project frontage to the ultimate 6-lane Major Road classification.

The proposed residential project would represent a change in land use from the existing condition; however, it would not interfere with any policies related to mass transit or non-motorized travel. Therefore, the project impacts would be less than significant.

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?	☐	☐	☐	☒

The designated congestion management agency for the San Diego region is SANDAG. The SANDAG

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

Regional Plan (RP) includes the Congestion Management Program (CMP) for the region which is intended element to monitor transportation system performance, develop programs to address near- and long-term congestion, and better integrate land use and transportation planning decisions. The CMP includes a requirement for enhanced CEQA review applicable to certain large developments that generate an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak hour vehicle trips. As the project would not generate these vehicle trips, the CMP is not applicable to the project. Additionally, as discussed for XVI.a above, no significant impacts would result relative to the City's Significance Thresholds and no mitigation is required. Thus, the project would not conflict with the applicable CMP or the City's transportation standards and no impact would result.

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?	☐	☐	☐	☒

The project site is within the Airport Land Use Plan and Airport Influence Area (Review Area 2 – airspace protection and overflight boundaries) for San Diego International Airport as depicted in the adopted Airport Land Use Compatibility Plan (ALUCP; 2014). Per the ALUCP, only airspace protection and overflight policies and standards apply within Review Area 2. Thus, the project would not have the potential to result in any change to air traffic patterns and no safety risks associated with airport operations would occur.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐

The project would not increase hazards associated with any design feature or incompatible uses. The proposed 319 residential units (including 6 shopkeeper units) would be accessed via three driveways from Friars Road including the main project entrance at the signalized intersection at Friars Road and Via de la Moda. Project improvements include widening Friars Road along the project frontage and constructing pedestrian and vehicular improvements to the signalized Friars Road / Via De La Moda intersection. This would improve access to and from the project site. Thus, the project would not increase hazards or introduce any incompatible uses and impacts would be less than significant.

e) Result in inadequate emergency access?	☐	☐	☒	☐

The project has been reviewed by the City Fire Department. All Fire Department requirements have been incorporated into the project design including adequate fire access, road widths, and identification of hydrant areas with red curbs. The project would be consistent with all policies of that department, with no impediments to emergency access. Impacts would be less than significant.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
safety of such facilities?				

The project would not alter the existing conditions of the site or adjacent facilities with regard to transportation. The project would not result in design measures or circulation features that would conflict with existing policies, plans, or programs supporting alternative transportation. The project would provide bicycle storage and lockers on-site and would construct pedestrian improvements along the project frontage which would support alternative transportation goals. Impacts would be less than significant.

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	☐	☐	☒	☐

Refer to response V(a) above. Information retrieved as part of the literature review and record search revealed that one previously recorded prehistoric cultural resource to be mapped within the area of potential effect (APE). Grading for previous road construction as well as realignment and widening, commercial developments, in addition to mining and agricultural practices have resulted in the loss of this resource. Additionally, generous mapping techniques of the past likely erroneously placed site boundaries in areas where the site was not actually located, such as up and along the 30-foot degree slope face of the Linda Vista Terrace immediately north of the project site.

Because there is a low potential to encounter archaeological subsurface materials during ground-disturbing activities, no further work was necessary. No impact would result.

No tribal cultural resources as defined by Public Resources Code section 21074 have been identified on the project site. Furthermore, the project site was not determined to be eligible for listing on either the State or local register of historical resources.

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 © of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision © of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Refer to response V(a) above. Refer to response V(a) above. Information retrieved as part of the literature review and record search revealed that one previously recorded prehistoric cultural

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

resource to be mapped within the area of potential effect (APE). Grading for previous road construction as well as realignment and widening, commercial developments, in addition to mining and agricultural practices have resulted in the loss of this resource. Additionally, generous mapping techniques of the past likely erroneously placed site boundaries in areas where the site was not actually located, such as up and along the 30-foot degree slope face of the Linda Vista Terrace immediately north of the project site.

Because there is a low potential to encounter archaeological subsurface materials during ground-disturbing activities, no further work was necessary. No impact would result.

No significant resources pursuant to subdivision (c) of Public Resources Code Section 5024.1 have been identified on the project site.

XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐

Wastewater discharges from the project would be routed into the San Diego Metropolitan Sewerage System and ultimately treated at the Point Loma Wastewater Treatment Plant (WWTP). A joint permit issued by the California Regional Water Quality Control Board, San Diego Region (Regional Board) and the U.S. Environmental Protection Agency (EPA) regulate the discharge of treated wastewater from the Point Loma WWTP into the Pacific Ocean. The City of San Diego's water monitoring program ensures that the treated water at the Point Loma WWTP complies with all permits and state and federal water quality-based standards. Therefore, the project would not exceed applicable wastewater treatment requirements with respect to discharges to the sewer system. Impacts would be less than significant.

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?	☐	☐	☒	☐

The project would construct on-site water lines to connect to the existing 16-inch water main in Friars Road. All public water facilities including services and meters would be designed and constructed in accordance with current City of San Diego Water Facility Design Guidelines and City regulations.

For wastewater treatment, the project would construct two private sewer laterals that would route internally through the parking structure to the west, exit the parking structure on the southwest side, and connect into the existing 8-inch PVC sewer main per City of San Diego Standard Drawings for Public Works construction. The City Public Utilities Department maintains the sewer system in this area. The San Diego Metropolitan Sewerage System provides regional wastewater collection, treatment, and disposal services for the City. The Point Loma Wastewater Treatment Plant treats wastewater from residential, commercial, and industrial sources in the City of San Diego. No existing capacity issues have been identified to meet the population forecast demands. Only laterals

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

connections and on-site realignment of the sewer main would be required for the project, no line extensions would be necessary.

The proposed project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities that would cause significant environmental effects. Existing water and sewer facilities are currently available to the existing development. The project proposes an increased residential density to the area; however, improvements would be limited to extension of pipes onto the project site and relocation of sewer lines. Sewer and water capacity fees will be due and collected at the issuance of building permits. Thus, impacts would be less than significant.

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?	☐	☐	☒	☐

The project would construct on-site storm water drainage facilities and would not change the existing off-site runoff pattern as discussed in Sections IX.a) and IX.c). The project would include storm water drainage facility upgrades necessary to support the proposed project. All facility construction would be consistent with the City's Drainage Master Plan(s) and City Engineering Standards. Thus, impacts would be less than significant.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐

The City of San Diego Public Utilities Department would provide water to the project. The project would remove existing commercial buildings and would construct 319-dwelling units, consistent with the community plan. This change would not represent a substantial increase in water demand. Furthermore, the water demand was accounted for in the City's water demand projections that are used to plan for and meet the City's water supply needs.

The City is required by the Urban Water Management Planning Act, California Water Code Sections 10610 through 10657, to prepare an Urban Water Management Plan (UWMP) every five years. The City released their Draft 2015 UWMP for public comment in April 2016. The 2015 Plan addresses the City's existing water system and includes a forecast of water demands over the next 5 years. The Plan also includes an evaluation of supplies necessary to meet those demands during normal, single-dry and multiple-dry years to help ensure water supply reliability over the next 25 years. As the project would be consistent with the Linda Vista Community Plan and was considered within water demand projections used to develop UWMP's, the City's Public Utilities Department would have enough planned supply to serve the project's water needs.

The City has also developed several planning documents including a Long-Range Water Resources Plan (LRWRP) in 2012. The LRWRP represents the strategic vision for water supply, and identifies a number of short-term and long-term actions to reduce reliance on imported water and improve supply reliability for the City. These actions, such as increasing local water supplies, developing

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

groundwater sources, and increasing conservation would reduce the City's reliance on imported water and increase water reliability.

In addition to the measures being taken by the City to improve water supply reliability to the region, the project would be designed and constructed to conserve water through low water use landscaping and installation of water conserving appliances such as low flow toilets and fixtures. All irrigation systems would be designed to conform to Municipal Code standards and Land Development code and Land Development Manual – Landscape Standards which includes requirements to maximize water conservation. Overall, the project would not be an excessive user of water as multi-family housing generally requires less water than an equivalent single-family residence and new construction would ensure compliance with current building code requirements with associated water conservation benefits. Thus, there would be sufficient water supplies to serve the project and no new entitlements or resources would be required. Impacts would be less than significant.

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?	☐	☐	☒	☐

Refer to Response XVII.b. The City Public Utilities Department has reviewed the project and determined that adequate capacity is available to serve the project in addition to existing commitments. Impacts would be less than significant.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐

During project construction as well as the operational phase, the project would generate waste; therefore a Conceptual Waste Management Plan was prepared for the project (RECON Environmental Inc., December 14, 2016). The waste management plan identifies that project demolition, grading, and construction are estimated to generate 130,412 tons of waste, of which 99.7 percent (130,022 tons) would be diverted primarily through source separation. The demolition and construction waste would be separated on-site into material-specific containers in order to facilitate reuse and recycling and the export soil (from grading cuts) would be recycled using the City of San Diego Clean Fill Dirt Program or an approved clean fill dirt handler. A designated solid waste materials coordinator will ensure that all contractors and subcontractors are educated and that procedures for waste reduction and recycling efforts are implemented. This would reduce the anticipated impact of waste disposal to below the threshold of direct significance as well as greatly exceed the state requirement of 50 percent and goal of 75 percent.

During occupancy, an ongoing waste management plan would include provision of sufficient interior and exterior storage space for refuse and recyclable materials, and a means of handling and recycling landscaping and green waste materials. Although the occupancy phase is anticipated to involve a recurring shortcoming of only 40 percent diversion with implementation of an ongoing

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

waste management plan, this would be compensated for by the near 100 percent diversion rate during the other phases

The City has enacted codes and policies aimed at helping it achieve this diversion level, including the Refuse and Recyclable Materials Storage Regulations (Municipal Code Chapter 14, Article 2 Division 8), Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7), and the Construction and Demolition (C&D) Debris Deposit Ordinance (Municipal Code Chapter 6, Article 6, Division 6). The project would comply with these codes.

With the implementation of the Waste Management Plan and compliance with the 75% diversion of construction-related waste, impacts related to solid waste generated would be less than significant.

g) Comply with federal, state, and local statutes and regulation related to solid waste?	☐	☐	☒	☐

The project would comply with all federal, state, and local regulations related to solid waste as prescribed in the Waste Management Plan. See XVII.e. Therefore, impacts would be less than significant.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE –

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

The project may have the potential to degrade the quality of the environment, notably with respect to Biological Resources, and Paleontological Resources. As such, mitigation measures have been incorporated to reduce impacts to less than significant.

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 futures projects)?	☐	☐	☒	☐

As documented in this Initial Study, the project may have the potential to degrade the environment as a result of impacts to Biological Resources and Paleontological Resources, which may have cumulatively considerable impacts. As such, mitigation measures have been proposed to reduce

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

impacts to less than significant. Other future projects within the surrounding neighborhood or community would be required to comply with applicable local, state, and federal regulations to reduce potential impacts to less than significant, or to the extent possible.

As such, the project is not anticipated to contribute to potentially significant cumulative environmental impacts.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

As discussed throughout this document, it is not anticipated that demolition or construction activities would create conditions that would significantly directly or indirectly impact human beings. Where appropriate, mitigation measures have been required, but in all issue areas impacts are no impact, less than significant, or can be reduced to less than significant through mitigation. For this reason, environmental effects fall below the thresholds established by CEQA and the City of San Diego and therefore would not result in significant impacts. Impacts would be less than significant

INITIAL STUDY CHECKLIST

REFERENCES

I. Aesthetics / Neighborhood Character

_X_ City of San Diego General Plan.

_X_ Community Plans: Linda Vista Community Plan

II. Agricultural Resources & Forest Resources

_X_ 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

_X_ Regional Air Quality Strategies (RAQS) - APCD

_X_ Site Specific Report:

RECON 2016a. Air Quality Analysis for the Friars Road Multi-Family Mixed-Use Project, San Diego, California. December 14.

IV. Biology

_X_ City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997

_X_ City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996

_X_ 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 & Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California, "January 2001

_X_ City of San Diego Land Development Code Biology Guidelines

_X_ Site Specific Report:

RECON 2016b. Biological Resource Report for the Friars Road Mixed-Use Project, San Diego, California. September 6.

V. Cultural Resources (includes Historical Resources)

_X_ City of San Diego Historical Resources Guidelines

___ City of San Diego Archaeology Library

___ Historical Resources Board List

___ Community Historical Survey:

_X_ Site Specific Report:

RECON 2015c. Archaeological Resources Report for the Friars Road Multi-Family Project Site, San Diego, California. October 27.

VI. Geology/Soils

_X_ 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

_X_ Site Specific Report:

Southern California Soil and Testing (SCST), Inc. 2014. Geotechnical Investigation Friars Road Apartment Development, San Diego California. October 15.

Southern California Soil and Testing (SCST), Inc. 2016a. Response to City Review Comment Friars Road Mixed-Use Development San Diego, California (Slope stability analysis). February 17.

Southern California Soil and Testing (SCST), Inc. 2016b. Addendum Geotechnical Report Infiltration Test Results and Responses to Review Comments Friars Road Mixed Use Development San Diego, California. September 9.

VII. Greenhouse Gas Emissions

_X_ Site Specific Report:

Latitude 33 Planning and Engineering 2016a. Climate Action Plan Checklist Friars Road Residential Mixed-Use (PTS#453373). December 14.

VIII. Hazards and Hazardous Materials

_X_ 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

____ Flood Insurance Rate Map (FIRM)

_X_ 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_ Site Specific Report:

Latitude 33 Planning and Engineering 2016a. Preliminary Drainage Study Friars Road Residential, City of San Diego. September 13.

X. Land Use and Planning

_X_ City of San Diego General Plan

_X_ Community Plan

____ Airport Land Use Compatibility Plan

_X_ 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

_X_ 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

_X_ Site Specific Report:

RECON 2016d. Noise Analysis for the Friars Road Mixed-Use Project San Diego, California. December 14.

XIII. Paleontological Resources

_X_ 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

_X_ 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

_X_ Site Specific Report:

Linscott Law and Greenspan 2016. Transportation Impact Analysis – Friars Road Residential. October 25.

XVIII. Utilities

_X_ Site Specific Report:

RECON 2016e. Waste Management Plan for the Friars Road Mixed-Use Project, San Diego, California. December 14.

Latitude 33 Planning and Engineering 2016b. Preliminary Sewer Study, Friars Road Residential. October 28.

XIX. Water Conservation

____ Sunset Magazine, New Western Garden Book, Rev. ed. Menlo Park, CA: Sunset Magazine

XX. Water Quality

_X_ Site Specific Report:

Latitude 33 Planning and Engineering 2016c. Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP). September 13.

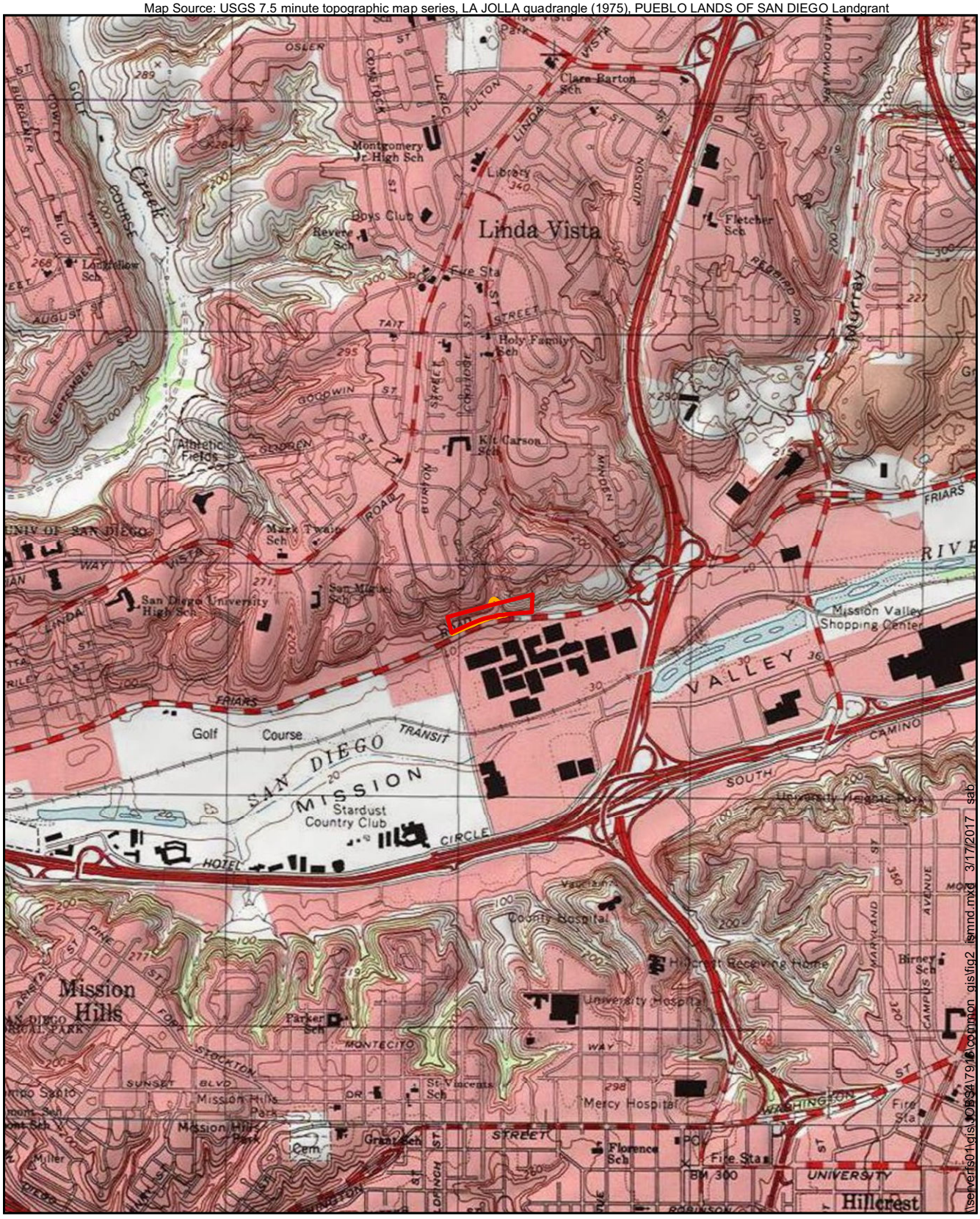
Created: REVISED - October 11, 2013

Project Location

FIGURE 1

Regional Location

Map Source: USGS 7.5 minute topographic map series, LA JOLLA quadrangle (1975), PUEBLO LANDS OF SAN DIEGO Landgrant



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Project Boundary

Off-site Impact Area

FIGURE 2

Project Location on USGS Map

Image Source: SANDAG (flown Nov 2014)

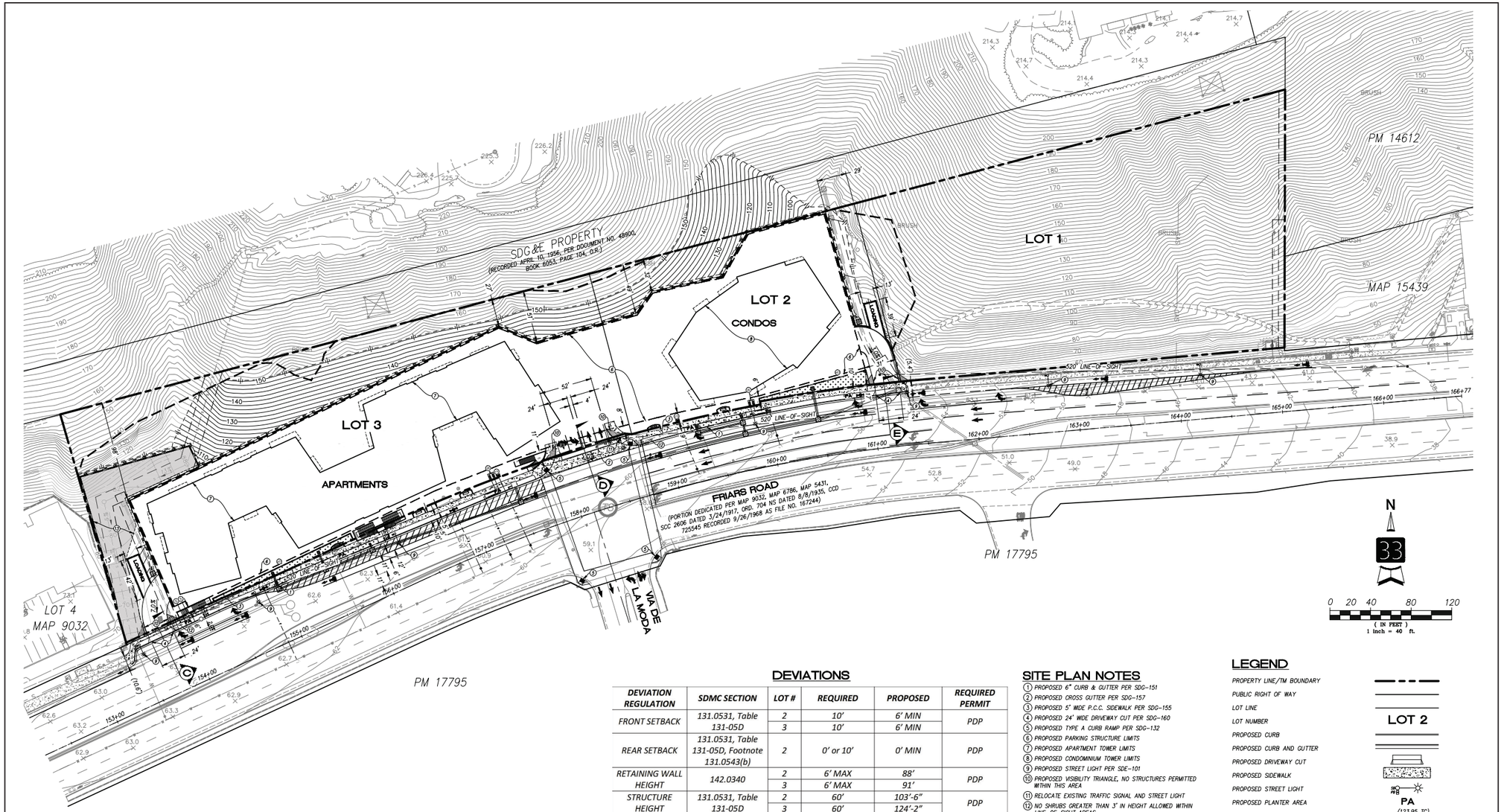
Project Boundary

Off-site Impact Area

FIGURE 3

Project Location on Aerial Photograph

Map Source: Latitude 33



DEVIATIONS

DEVIATION REGULATION	SDMC SECTION	LOT #	REQUIRED	PROPOSED	REQUIRED PERMIT
FRONT SETBACK	131.0531, Table 131-05D	2	10'	6' MIN	PDP
		3	10'	6' MIN	
REAR SETBACK	131.0531, Table 131-05D, Footnote 131.0543(b)	2	0' or 10'	0' MIN	PDP
RETAINING WALL HEIGHT	142.0340	2	6' MAX	88'	PDP
		3	6' MAX	91'	
STRUCTURE HEIGHT	131.0531, Table 131-05D	2	60'	103'-6"	PDP
		3	60'	124'-2"	
FLOOR AREA RATIO	131.0531, Table 131-05D	1-3	1.50	1.58	PDP
GROUND FLOOR RESIDENTIAL	131.0540(c)(1)	2-3	50%	<50%	PDP

SITE PLAN NOTES

1. PROPOSED 6" CURB & GUTTER PER SDG-151
2. PROPOSED CROSS GUTTER PER SDG-157
3. PROPOSED 5' WIDE P.C.C. SIDEWALK PER SDG-155
4. PROPOSED 24' WIDE DRIVEWAY CUT PER SDG-160
5. PROPOSED TYPE A CURB RAMP PER SDG-132
6. PROPOSED PARKING STRUCTURE LIMITS
7. PROPOSED APARTMENT TOWER LIMITS
8. PROPOSED CONDOMINIUM TOWER LIMITS
9. PROPOSED STREET LIGHT PER SDE-101
10. PROPOSED VISIBILITY TRIANGLE, NO STRUCTURES PERMITTED WITHIN THIS AREA
11. RELOCATE EXISTING TRAFFIC SIGNAL AND STREET LIGHT
12. NO SHRUBS GREATER THAN 3' IN HEIGHT ALLOWED WITHIN LINE-OF-SIGHT AREAS
13. PROPOSED COLORED CONCRETE SEWER ACCESS ROAD

LEGEND

- PROPERTY LINE/TM BOUNDARY
- PUBLIC RIGHT OF WAY
- LOT LINE
- LOT NUMBER — LOT 2
- PROPOSED CURB
- PROPOSED CURB AND GUTTER
- PROPOSED DRIVEWAY CUT
- PROPOSED SIDEWALK
- PROPOSED STREET LIGHT
- PROPOSED PLANTER AREA — PA
- EXISTING GRADE/ELEV — (123.95 TC) (123.45 FS)
- PROPOSED GRADE/ELEV — 123.95 TC 123.45 FS
- PROPOSED SEWER ACCESS PATH

NOTE

NO OBSTRUCTION INCLUDING LANDSCAPING OR SOLID WALLS IN THE VISIBILITY AREA SHALL EXCEED 3 FEET IN HEIGHT.

INTERSECTION SIGHT DISTANCE

EAST & WEST DRIVEWAYS & SIGNALIZED INTERSECTION:

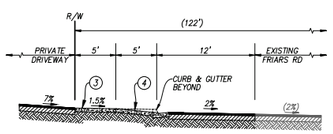
PER 201.1 OF THE HIGHWAY DESIGN MANUAL: "STOPPING SIGHT DISTANCE IS IS TO BE PROVIDED FOR ALL USERS , INCLUDING MOTORISTS AND BICYCLISTS, AT ALL ELEMENTS OF INTERCHANGES AND INTERSECTIONS AT GRADE. (SEE TOPIC 504, INDEX 405.1, & FIGURE 405.7)."

FRIARS ROAD 85% DESIGN SPEED (PER CITY'S SPEED SURVEY) = 47mph

FROM TABLE 405.1A OF THE HIGHWAY DESIGN MANUAL

CORNER SIGHT DISTANCE = **520.00'**

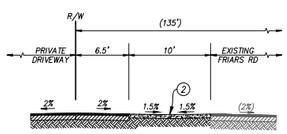
DRIVEWAY SECTIONS



WEST DRIVEWAY WIDTH = 24'

SECTION 'C'

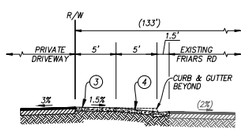
NOT TO SCALE



MAIN DRIVEWAY WIDTH = 52'

SECTION 'D'

NOT TO SCALE



EAST DRIVEWAY WIDTH = 24'

SECTION 'E'

NOT TO SCALE

THE CITY OF SAN DIEGO • STATE OF CALIFORNIA SEMPER VIGILANS

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FIGURE 4
Site Plan