



THE CITY OF SAN DIEGO

ENVIRONMENTAL IMPACT REPORT

Project No. 474586
SCH No. 2016071065

SUBJECT: Alexan Fashion Valley: SITE DEVELOPMENT PERMIT and PLANNED DEVELOPMENT PERMIT to demolish existing structures (69,651 square feet) and on-site surface parking and construction of a mixed used development comprised of 284 dwelling units, including 48 units with a home-business focus; 8,150 square feet of commercial (office use); and 3,145 square feet of commercial (restaurant use) within the Mission Valley Community Plan area. The project would range in height from five stories to six stories with mezzanines, wrapped around a six-story parking garage, and would have a total of 284 residential units and 11,295 square feet of commercial space (office and restaurant space). A total of 404 parking spaces would be provided in a six-story above ground and one-story below-ground parking structure, in addition to 65 surface parking spaces, for a total of 471 parking spaces.

The project site is zoned MV-CO (Mission Valley – Commercial Office), Development Intensity District (DID) C and is designated Commercial Office in the Mission Valley Community Plan. The proposed mixed-use development as allowed under the Multiple Use Option in the Community Plan.

UPDATE: **July 28, 2017.** Clarifications/revisions, minor typographical corrections, and additional information have been added to this document, in response to comments submitted when compared to the draft EIR. In accordance with the California Environmental Quality Act Section 15088.5, the addition of new information that clarifies, amplifies, or makes insignificant modifications and would not result in new impacts or no new mitigation does not require recirculation. Pursuant to Section 15088.5(a) of the CEQA Guidelines: "Significant new information" requiring recirculation includes for example, a disclosure of additional data or other information showing that:

- (1) A New significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of significance.

- (3) A feasible project alternative or mitigation measures considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

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

ENVIRONMENTAL DETERMINATION:

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

Based on the analysis conducted for the project described above, the City of San Diego, as the Lead Agency, has prepared the following Environmental Impact Report. The analysis conducted identified that the project could result in significant impacts to the following issues area(s): transportation/traffic circulation/parking (cumulative street segment impacts), geologic conditions (direct impact – liquefaction), historical resources (unknown subsurface archeological resources), and tribal cultural resources (unknown subsurface archeological resources). All impacts would be reduced to below a level of significance with mitigation measures identified in the EIR.

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

PUBLIC REVIEW DISTRIBUTION:

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

State of California

Caltrans, District 11 (31)
Department of Toxic Substance Control (39)
California Regional Water Quality Control Board (44)
State Clearinghouse (46A)
California Transportation Commission (51)
California Department of Transportation (51A)
California Department of Transportation (51B)
Native American Heritage Commission (56)

California Highway Patrol (58)

City of San Diego

Mayor's Office (91)

Councilmember Lightner, District 1 (MS 10A)

Councilmember Faulconer District 2 (MS 10A)

Councilmember Gloria, District 3 (MS 10A)

Councilmember Cole, District 4 (MS 10A)

Councilmember Kersey, District 5 (MS 10A)

Councilmember Zapf, District 6 (MS 10A)

Councilmember Sherman, District 7 (MS 10A)

Councilmember Alvarez, District 8 (MS 10A)

Councilmember Emerald, District 9 (MS 10A)

Development Services Department

EAS

Transportation

Planning Review

Fire Plan Review

Engineering Review

Geology

Landscaping

Park and Recreation

Plan Facilities Financing

Plan Long Range Planning

PUD-water and Sewer Development

Project Manager

Transportation Development (78)

Development Coordination (78A)

Fire and Life Safety Services (79)

San Diego Fire – Rescue Department Logistics (80)

Library Department (81)

Central Library (81A)

Mission Valley Branch Library (81R)

Environmental Services Department (93A)

Facilities Financing (93B)

City Attorney's Office- (MS 93C)

Others

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Metropolitan Transit System (112)

San Diego Gas & Electric (114)

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The San Diego River Park Foundation (163)

San Diego Natural History Museum (166)

San Diego River Conservancy (168)

KEA Environmental Inc. (178)

Citizens Coordinate for Century III (179)

Mission Valley Center Association (328)

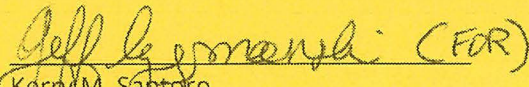
Friars Village HOA (328A)

Mary Johnson (328B)

Mission Valley Community Council (328C)
Union Tribune News (329)
Friends of Mission Valley Preserve (330B)
Mission Valley Planning Group (331)
General Manager, Fashion Valley (332)
Gary Akin -San Diego Gas & Electric (381)
The San Diego River Coalition (334)
Alec Schiffer, Trammell Crow
Karen L. Ruggels, K L R PLANNING, Consultant

RESULTS OF PUBLIC REVIEW:

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


Kerry M. Santoro
Deputy Director
Development Services Department

May 25, 2017
Date of Draft Report

July 28, 2017
Date of Final Report

Analyst: Jeffrey Szymanski

LETTERS OF COMMENTS AND RESPONSES

ALEXAN FASHION VALLEY PROJECT DRAFT EIR COMMENT LETTERS

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

In accordance with CEQA Guidelines Section 15204(a), review of an EIR should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. According to Section 15204(a), [t]he adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. Many of the comments received during public review of the Alexan Fashion Valley Project Draft EIR did not address the adequacy and/or sufficiency of the environmental document; however, staff endeavored to provide responses as appropriate as a courtesy to the commenters. Where letters of comment have resulted in revisions to the June 2017 Draft EIR, those changes are indicated in the Final EIR in strike-out/underline format (where omitted text is shown as ~~stricken~~ and added text is shown as underlined). Revisions that have been made to the Final EIR do not affect the conclusions contained in the EIR or the adequacy of the environmental document.

Letter	Author	Address	Date	Representing	Page Number of Letter
LOCAL AGENCIES					
A	Destiny Colocho Manager, Rincon Cultural Resources Department	Rincon Band of Luiseño Indians 1 W. Tribal Road Valley Center, CA 92082	June 7, 2017	Rincon Band of Luiseño Indians	3
B	Rey Teran Resource Management	Viejas Band of Kumeyaay Indians PO Box 908 Alpine, CA 91903 #1 Viejas Grade Road Alpine, CA 91901	June 9, 2017	Viejas Band of Kumeyaay Indians	4
C	James W. Royle Environmental Review Committee	San Diego County Archaeological Society P.O. Box 81106 San Diego, CA 92138	June 17, 2017	San Diego County Archaeological Society	5
D	Ralph Goff	Campo Band of Mission Indians	June 29, 2017	Campo Band of Mission Indians	6

LETTERS OF COMMENTS AND RESPONSES

Letter	Author	Address	Date	Representing	Page Number of Letter
	Chairman	36190 Church Rd., Suite 1 Campo, CA 91906			
E	Seth Litchney Senior Regional Planner	SANDAG 401 B Street, Suite 800 San Diego, CA 92101	July 3, 2017	San Diego Association of Governments	7

RINCON BAND OF LUISEÑO INDIANS

Cultural Resources Department

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



June 7, 2017

Jeffrey Szymanski
The City of San Diego
Development Services Department
1222 First Ave., MS 501
San Diego, CA 92101

Re: Alexan Fashion Valley Project No. 474586

Dear Mr. Szymanski:

This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the Alexan Fashion Valley Project No. 474586. 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,

Destiny Colocho
Manager
Rincon Cultural Resources Department

Bo Mazzetti
Tribal Chairman

Tishmall Turner
Vice Chairwoman

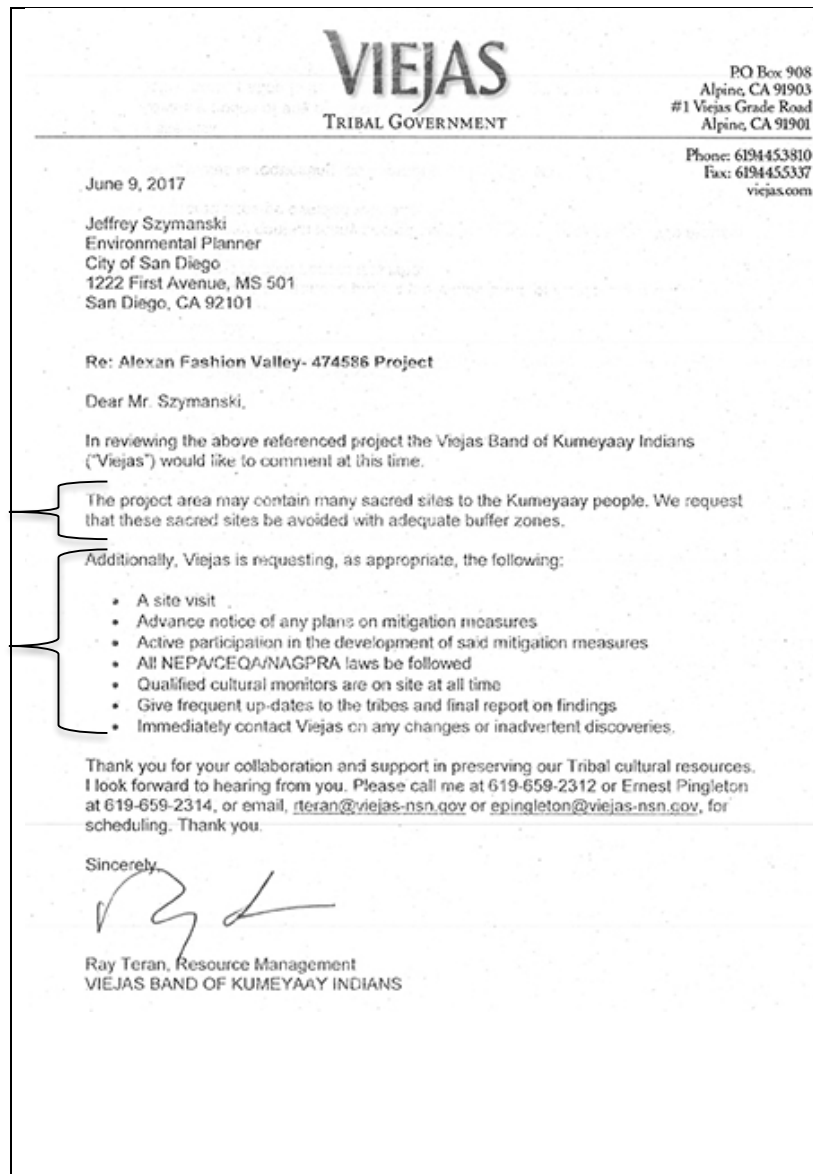
Steve Stallings
Council Member

Laurie E. Gonzalez
Council Member

Alfonso Kolb
Council Member

A-1 Comment noted. The City of San Diego acknowledges that the project area is not located within the Luiseno Aboriginal Territory. The City has provided all local tribes with the draft environmental document for their review.

LETTERS OF COMMENTS AND RESPONSES



B-1 The project site is fully developed with an office building, parking lots, landscaping, and associated improvements. In compliance with CEQA, project impacts have been fully evaluated in the EIR. However, if sacred sites are discovered during construction, appropriate procedures will take place as required by MM 5.10-1. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record. If Native American resources are discovered the Native American consultant/monitor shall evaluate the significance of the resource. If the resource is significant, an Archaeological Data Recovery Program shall be developed that has been reviewed by the Native American consultant/monitor.

B-2 See response B-1, above. As the project site is fully developed with an office building, parking lots, landscaping, and associated improvements, a site visit would not be appropriate. In compliance with CEQA, project impacts have been fully evaluated in the EIR. Mitigation Measure 5.10-1 (MM 5.10-1) would be implemented as part of the project and includes, among other requirements, the use of a Native American consultant/monitor who will be present at the pre-construction meeting and will participate in a site visit at that time. As required by MM 5.10-1, the archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record. If Native American resources are discovered the Native American consultant/monitor shall evaluate the significance of the resource. If the resource is significant, an Archaeological Data Recovery Program shall be developed that has been reviewed by the Native American consultant/monitor. A final report regarding the results of the archaeological monitoring will be prepared and submitted to the City of San Diego. If human remains are encountered during site grading/excavation that are determined to be Native American, the Medical Examiner will notify the Native American Heritage Commission within 24 hours, and the NAHC will immediately identify the person or persons determined to be the Most Likely Descendent and provide contact information.

LETTERS OF COMMENTS AND RESPONSES



San Diego County Archaeological Society, Inc.
Environmental Review Committee

17 June 2017

To: Mr. Jeffrey Szymanski
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Environmental Impact Report
Alexan Fashion Valley
Project No.474586

Dear Mr. Szymanski:

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

Based on the information contained in the DEIR and its Appendix L, we have the following comments:

1. We agree with the impact analysis found in Appendix L (once Appendix L can be found; see below), and with the mitigation measures specified in Section 5.10 of the DEIR.
2. The download file for Appendices K-P posted on the DSD website is an inexcusably difficult to use mess. There is no easy way to locate Appendix L but to page through appendices to appendices of Appendix K, as there are no groupings or tabs for the DEIR's appendices. Furthermore, there aren't even "cover sheets" for the appendices—they just run into each other. At least the DEIR's appendices should be made user-friendly if and when there is an FEIR for this project.

SDCAS appreciates the opportunity to provide our comments on this DEIR.

Sincerely,


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

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

C-1 Comment noted.

C-2 Comment noted. While the comment expresses issues with accessing the project files, it does not address the completeness or accuracy of the EIR. No response is necessary.



Campo Band of Mission Indians

Chairman Ralph Goff
Vice-Chairman Harry P. Cuero Jr.
Secretary Kerm Shipp
Treasurer Marcus Cuero
Committee Brian Connolly Sr.
Committee Steven M. Cuero
Committee Benjamin Dyche

June 29, 2017

Subject: Alexan Fashion Valley Project No. 474586

Campo Band of Mission Indians concludes that Alexan Fashion Valley Project No. 474586 will have a significant impact on cultural resources in the project area. Campo Band of Mission Indians request that cultural monitors be assigned to this project to ensure that cultural resources are not impacted. If cultural resources are impacted Campo Band of Mission Indians would like to be notified of any mitigation taking place. If you have questions please contact Marcus Cuero at (619) 478-9046, email at marcuscuro@campo-nsn.gov.

Sincerely,

Ralph Goff

Chairman

Campo Band of Mission Indians

36190 Church Rd., Suite 1 Campo, CA 91906 Phone: (619) 478-9046 Fax: (619) 478-5818

D-1 Please see responses B-1, C-1, and C-2, above.

D-1



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

July 3, 2017

File Number 3300300

Mr. Jeffrey Szymanski
City of San Diego
Development Services Center
1222 First Avenue, Mail Station 501
San Diego, CA 92101

Dear Mr. Szymanski:

SUBJECT: Alexan Fashion Valley Draft Environmental Impact Report
(Project No. 474586)

Thank you for the opportunity to comment on the City of San Diego's Alexan Fashion Valley Draft Environmental Impact Report (EIR). The San Diego Association of Governments (SANDAG) appreciates the City of San Diego's efforts to implement the policies included in San Diego Forward: The Regional Plan that emphasize the need for better land use and transportation coordination. These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG's comments are based on policies included in the Regional Plan and are submitted from a regional perspective.

San Diego Forward: The Regional Plan

Throughout the document (and particularly on pages 2-7 and 2-8), please replace any reference to the 2050 Regional Transportation Plan (RTP) with a reference to San Diego Forward: The Regional Plan (Regional Plan) when intending to reference the Regional Plan adopted on October 9, 2015. Additionally, the Regional Comprehensive Plan was updated alongside the RTP, as the Regional Plan combined the two documents into one update. Suggested language for these references is provided below:

"San Diego Forward: The Regional Plan (Regional Plan) combines the region's two most important existing planning documents: the Regional Comprehensive Plan (RCP), and the Regional Transportation Plan and its Sustainable Communities Strategy (RTP/SCS). The RCP, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas including urban form, transportation, housing, healthy environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the Regional Plan. On April 24, 2015, SANDAG released the Draft Regional Plan for public comment, with a closing date of July 15, 2015. A final Regional Plan was adopted by the SANDAG Board of Directors on October 9, 2015."

E-1 Comments noted.

E-2 Revisions have been made in the Final EIR, as requested.

E-1

E-2

MEMBER AGENCIES

Cities of

Carlsbad

Chula Vista

Coronado

Del Mar

El Cajon

Encinitas

Escondido

Imperial Beach

La Mesa

Lemon Grove

National City

Oceanside

Poway

San Diego

San Marcos

San Ramon

Santee

Solana Beach

Vista

and

County of San Diego

ADVISORY MEMBERS

Imperial County

California Department

of Transportation

Metropolitan

Transit System

North County

Transit District

United States

Department of Defense

San Diego

United Port District

San Diego County

Water Authority

Southern California

Tribal Chairmen's Association

Mexico

LETTERS OF COMMENTS AND RESPONSES

<p>E-3</p>	<p>Transit Routes</p> <p>The project site is in a Smart Growth Opportunity Area on the SANDAG Smart Growth Concept Map. These areas can support increased transit use, walking, and biking. Therefore, in Section 5.2, please consider including the following planned transit routes/services in the plan documents and increasing access to these services (e.g., pedestrian and bicycle improvements to ensure access to the Fashion Valley Transit Station):</p> <ul style="list-style-type: none"> • <i>Rapid</i> service (Routes 41 and 120) <ul style="list-style-type: none"> ◦ Route 120, currently a high-frequency local bus service, will be transitioned to a <i>Rapid</i> service • High-frequency local bus service (Routes 25, 88, 646, and 928) <p>Transportation Demand Management</p> <p>Thank you for including Transportation Demand Management (TDM) strategies and parking management strategies in the Draft EIR for the Alexan Fashion Valley Project. iCommute is the TDM program for the San Diego region. Please change "Ride-Link" references in the Draft EIR to "iCommute" (Draft EIR, page 5.2-20). Additionally, the reference to "SANDAG's Ridematcher service" should be changed to "online ridematching services" (Draft EIR, page 5.5-19).</p> <p>E-4</p> <p>The iCommute program can assist future commercial tenants with implementing TDM programs for their employees. iCommute offers a Regional Vanpool Program, ridematching services, a Guaranteed Ride Home service, bike education, and support for taking transit. More information on these programs can be accessed through iCommuteSD.com.</p> <p>Other Considerations</p> <p>SANDAG has several additional resources that can be used for additional information or clarification on topics discussed in this letter. These can be found on the SANDAG website at sandag.org/figr:</p> <ol style="list-style-type: none"> 1. Riding to 2050, the San Diego Regional Bike Plan 2. Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region 3. Integrating Transportation Demand Management into the Planning and Development Process – A Reference for Cities <p>E-5</p> <p>When available, please send any additional environmental documents related to this project to:</p> <p>E-6</p> <p>SANDAG Attention: Intergovernmental Review 401 B Street, Suite 800 San Diego, CA 92101</p>	<p>E-3 Additions have been made in the Final EIR to reflect high frequency local bus service and Rapid service, as requested.</p> <p>E-4 These revisions have been made in the Final EIR, as requested.</p> <p>E-5 Comments noted.</p> <p>E-6 Comment noted. SANDAG is included on the list of agencies to receive environmental documents prepared by the City of San Diego.</p>
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LETTERS OF COMMENTS AND RESPONSES

We appreciate the opportunity to comment on the City of San Diego's Alexan Fashion Valley Draft EIR. If you have any questions, please contact me at (619) 699-1943 or at seth.litchney@sandag.org.

Sincerely,



SETH LITCHNEY
Senior Regional Planner

SL/KHE/abar

EIR

ALEXAN FASHION VALLEY



FINAL: JULY 2017

ALEXAN FASHION VALLEY PROJECT

FINAL ENVIRONMENTAL IMPACT REPORT

JULY 2017

SCH No. 2016071065

PTS No. 474586

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LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ACMs	asbestos containing materials
ADA	American's with Disabilities Act
ADD	Assistant Deputy Director
ADRP	Archaeological Data Recovery Program
ADT	Average Daily Traffic
AFY	acre-feet per year
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUC Plan/ALUCP	Airport Land Use Compatibility Plan
AM/a.m.	morning
AME	Archaeological Monitoring Exhibit
AMSL	above mean sea level
APCD	Air Pollution Control District
ARB	Air Resources Board
ASBS	Area of Biological Significance
BFE	Base Flood Elevations
BI	Building Inspector
BMP(s)	Best Management Practice(s)
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAC	California Administrative Code
CAC	Certified Asbestos Consultant
CAD	Computer Aided Dispatch System
CalEPA	California EPA
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CBC	California Building Code
CCR	California Code of Regulations
CD	construction documents
CEFS	California Emission Forecasting System
CEIDARS	California Emission Inventory Development and Reporting System
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response Compensation
CFR	Code of Federal Regulations
CFS/cfs	cubic feet per second
CH ₄	methane
City	City of San Diego
CLOMR-F	Condition Letter of Map Revision
CLUP	Comprehensive Land Use Plan
CM	Construction Manager

LIST OF ACRONYMS AND ABBREVIATIONS

CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent
County	County of San Diego
CPT	Core Penetration Test
CPTED	Crime Prevention Through Environmental Design
CRHR	California Register of Historic Resources
CSVR	Consultant Site Visit Record
dB	decibel
dBA	A-weighted decibel
DEH	County Department of Environmental Health
°	degrees, as in degrees Fahrenheit
DIA	deferred improvement agreement
DID	Development Intensity District
DSD	Development Services Department
EAS	City of San Diego Environmental Analysis Section
ED	Environmental Document
EFZ	Earthquake Fault Zone
EIR	Environmental Impact Report
EMFAC	emissions factors
EPA	Environmental Protection Agency
EPIC	San Diego School of Law Energy Policy Initiative Center
ESD	Environmental Services Department
F	Fahrenheit
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
ft.	feet
g/bhp-hr	grams of particulate matter per brake horsepower hour
GCC	global climate change
GHG	greenhouse gas
g/l	grams per liter
GWP	global warming potential
HAPs	Hazardous Air Pollutants
HCD	Housing and Community Development
HCM	Highway Capacity Manual
HFC	hydrofluorocarbon
HFE	hydrofluorinated ethers
HRG	Historic Resources Guidelines
H ₂ S	hydrogen sulfide

LIST OF ACRONYMS AND ABBREVIATIONS

HUD	Federal Department of Housing and Urban Development
I-	Interstate, as in I-8
IOD	irrevocable offer of dedication
IPCC	United Nations Intergovernmental Panel on Climate Change
ISO	California Independent System Operator
IWRP	Integrated Water Resources Plan
kV	kilovolt
LCFS	Low Carbon Fuel Standard
Ldn	day-night average level
Leq	equivalent continuous sound level
Lmax	maximum noise level
LOS	level of service
LRT	light rail transit
MCAS Miramar	Marine Corps Air Station Miramar
MCEG	Mean Maximum Considered Earthquake
mgd	million gallons per day
mg/cm ²	square centimeter of surface area
MHPA	Multi Habitat Planning Area
MLD	Most Likely Descendent
MMC	Mitigation Monitoring Coordination
MMR	Mitigation Monitoring Report
MMRP	Mitigation Monitoring Reporting Program
MMT	million metric tons
MMTCO ₂ e	million metric tons equivalent CO ₂
MSCP	Multiple Species Conservation Program
MT	metric tons
MTS	Metropolitan Transit System
MVPDO	Mission Valley Planned District Ordinance
MV-CO	Mission Valley – Commercial Office
MV-CO-CV	Mission Valley – Commercial Office and Visitor Commercial
MV-I	Mission Valley- Commercial Office
MV-M	Mission Valley- Multiple Use
MW	megawatt
MWD	Metropolitan Water District of Southern California
MVPDO	Mission Valley Planned District Ordinance
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NF ₃	nitrogen trifluoride
NOC	Notice of Completion
NOP	Notice of Preparation
NO	nitrogen oxide
NOx	oxides of nitrogen

LIST OF ACRONYMS AND ABBREVIATIONS

NO ₂	nitrogen dioxide
N ₂ O	nitrous oxide
NRHP	National Register of Historic Places
NTP	Notice to Proceed
O ₃	ozone
OF-1-1	Open Space- Floodplain
OFFROAD	emissions from off-road sources
OHP	Office of Historic Preservation
OSHA	Occupational Safety and Health Administration
Pb	lead
PDO	Planned Development Ordinance
PGA	peak ground acceleration
PFC	perfluorocarbon
PI	Principal Investigator
PM	particulate matter
PM/p.m.	afternoon
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PM ₁₀	particulate matter of 10 microns in diameter or smaller
PRC	Public Resources Code
PTS	Project Tracking System
PUD	Public Utilities Department
PVC	polyvinyl chloride
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan
RCP	reinforced concrete pipe
RE	Resident Engineer
ROG	Reactive Organic Gas
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RUWMP	Regional Urban Water Management Plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCIC	South Coastal Information Center
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCGHGI	San Diego County Greenhouse Gas Inventory
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire-Rescue Department

LIST OF ACRONYMS AND ABBREVIATIONS

SDG&E	San Diego Gas and Electric
SDP	Site Development Permit
SDPD	San Diego Police Department
SDPL	San Diego Public Library
SDRPMP	San Diego River Park Master Plan
SDUSD	San Diego Unified School District
sf	square feet
SF ₆	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SR	State Route, as in SR-163
STC	sound transmission class
SRRE	Source Reduction and Recycling Element
SWQMP	Storm Water Quality Management Plan
TAC(s)	Toxic Air Contaminant(s)
TCR	Tribal Cultural Resource
TDM	Transportation Demand Management
TIA	Traffic Impact Analysis
TPA	Transit Priority Area
UBC	Uniform Building Code
USAI	Urban Systems Associates, Inc.
USFWS	U.S. Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	United States Geological Survey
UT	Union Tribune
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	Volatile Organic Compounds
WMP	Waste Management Plan
WSA	Water Supply Assessment

EXECUTIVE SUMMARY

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

Purpose and Scope of the EIR

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

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

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

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

In accordance with CEQA Guidelines Section 15082(a), an NOP, dated July 25, 2016, was prepared for the project and distributed to all Responsible and Trustee Agencies, as well as other agencies and members of the public who may have an interest in the project. The purpose of the NOP was to solicit comments on the scope and analysis to be included in the EIR for the proposed Alexan Fashion Valley project. A copy of the NOP and letters received during its review are included in Appendix A to this EIR.

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

- Land Use
- Transportation/Traffic
Circulation/Parking
- Visual Quality/Neighborhood
Character
- Air Quality
- Global Climate Change
- Energy
- Noise
- Geologic Conditions
- Paleontological Resources
- Historical Resources
- Hydrology
- Water Quality
- Health and Safety
- Public Services and Facilities
- Public Utilities
- Health and Safety
- Tribal Cultural Resources
- Cumulative Effects

Based on the analysis contained in Section 5.0, *Environmental Analysis*, of this EIR, the proposed project would result in the potential for significant impacts to transportation/traffic circulation/parking (direct cumulative street segment impacts), historical resources (unknown subsurface archeological resources), and tribal cultural resources (unknown subsurface archeological resources). Mitigation measures have been identified which would reduce all impacts to below a level of significance.

Project Location and Setting

The regional and local setting of the project is discussed in Section 2.0, *Environmental Setting*, of this EIR. The proposed Alexan Fashion Valley project site is located at 123 Camino de la Reina. Situated north of the Interstate 8 (I-8)/State Route 163 (SR-163) interchange, south and east of Camino de la Reina, and west of SR-163, the Alexan Fashion Valley project site encompasses approximately 4.92 acres. The former Union-Tribune building is located west of the project site and to the north is the San Diego River and Fashion Valley Mall, a regional mall providing upscale shops and a variety of restaurants, as well as a transit center with bus and light rail transit (LRT) stations. The I-8/SR-163 interchange is located east and south of the project site. Farther east of the project site, beyond the freeway interchange, is a four-story commercial office building and a 12-story commercial office building with a mixture of surface and structured parking. Farther east of the project site are car dealerships; multi-family housing developments; the approved Camino Del Rio Mixed Use project under construction as the “Millennium Mission Valley” project; and Westfield Mission Valley West shopping center, which provides a mix of commercial and restaurant establishments. LRT stations are located at Hazard Center (the Hazard Center Station) northeast of the project site, on the north side of the San Diego River, as well as at the Fashion Valley Mall (Fashion Valley transit Center) located northwest of the project site, on the north side of the San Diego River.

Regional access to the site is provided via I-8, located immediately south of the project site; SR-163, located immediately east of the project site; and I-805, located approximately two miles east of the project site. Local project access is provided via Camino de la Reina, which fronts the project along the north and west. Three driveways provide access to the project site from Camino de la Reina.

Project Baseline

CEQA Guidelines Section 15125(a) guides the discussion of the environmental setting for the proposed project and advises in the establishment of the project baseline. According to CEQA, “[a]n EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published[...]. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” Baseline conditions for the Alexan Fashion Valley project is the fully developed site as established in Section 2.0, *Environmental Setting*.

Baseline condition for the Alexan Fashion Valley project is the fully developed site located at 123 Camino de la Reina. This development includes 69,651 square feet of office buildings and associated surface parking. Baseline condition also includes existing landscaping, parking lots, entry drive, and pedestrian sidewalks.

Project Description

The Alexan Fashion Valley project proposes redevelopment of the existing office complex with a mixed-use development that would include a mix of residential and commercial retail and office uses. The existing 69,651 square feet of office buildings and associated facilities would be demolished and replaced with up to 284 residential units (including 48 with a home business focus), 8,150 square feet of commercial (office use) and 3,145 square feet of commercial (restaurant use).

The project requires a Site Development Permit (SDP) in accordance with San Diego Municipal Code Section 1514.0201(d) (A) to allow for the development of a mix of residential, commercial, and retail uses within central Mission Valley where the proposed uses would exceed the Threshold 1 Average Daily Trip (ADT) allocation of the Mission Valley Planned District Ordinance. The project also requires a Planned Development Permit (PDP) in order to implement the Multiple Use option in the Mission Valley Community Plan. The project would develop under the existing zone and land use designation; therefore, a Rezone and Community Plan Amendment would not be required. The elements of these various project actions are described in detail in Section 3.0, *Project Description*, of this EIR.

Summary of Environmental Impacts and Mitigation

Section 5.0 of this EIR presents the *Environmental Analysis* of the proposed project. Based on the analysis contained in Section 5.0 of this EIR, the proposed Alexan Fashion Valley project would result in the potential for significant impacts to transportation/traffic circulation/parking (cumulative street segment impacts), geologic conditions (potential direct impact liquefaction), historical resources (unknown subsurface archeological resources), and tribal cultural resources (unknown subsurface archeological resources). Mitigation measures have been identified which would reduce all impacts to below a level of significance.

Table ES-1, *Summary of Environmental Impacts and Mitigation Measures*, summarizes the potential environmental impacts of the Alexan Fashion Valley project by issue area, as analyzed in Section 5.0, *Environmental Analysis*, of this EIR. The table also provides a summary of the mitigation measures proposed to avoid or reduce significant adverse impacts. The significance of environmental impacts after implementation of the recommended mitigation measures is provided in the last column of Table ES-1. Responsibilities for monitoring compliance with each mitigation measure are provided in Section 11.0, *Mitigation Monitoring and Reporting Program*, of this EIR.

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

Environmental Impacts	Mitigation Measures	Level of Significance After Mitigation
Transportation/Traffic Circulation The proposed project could result in cumulative impacts to street segments as a result of the project.	Mitigation measures MM 5.2-1 and MM 5.2-2 identified in Section 5.2, <i>Transportation/Traffic Circulation/ Parking</i> , would mitigate significant project impacts.	Mitigated to below a level of significance.
Geologic Conditions Potential direct impact to liquefaction is considered significant.	Mitigation measure MM 5.8-1 presented in Section 5.8, <i>Geologic Conditions</i> , would reduce direct project impacts.	Mitigated to below a level of significance.
Historical Resources The proposed project could result in direct impacts to archaeological resources.	Mitigation measure MM 5.10-1 presented in Section 5.10, <i>Historical Resources</i> , would reduce direct project impacts to archaeological resources.	Mitigated to below a level of significance.
Tribal Cultural Resources The proposed project could result in direct impacts to unknown buried tribal cultural resources (archeology) located beneath the ground surface that could be of cultural value to California Native Tribes.	Mitigation measure MM 5.10-1 presented in Section 5.10, <i>Historical Resources</i> , would reduce direct project impacts to tribal cultural resources.	Mitigated to below a level of significance.

Potential Areas of Controversy

Pursuant to CEQA Guidelines Section 15123(b)(2), an EIR shall identify areas of controversy known to the Lead Agency, including issues raised by the agencies and the public, and issues to be resolved, including the choice among alternatives and whether and how to mitigate for significant effects. The NOP for the EIR was distributed on July 25, 2016, for a 30-day public review and comment period. In addition, a Public Scoping Meeting was held on August 8, 2016. Comments received in response to the NOP and at the public scoping session present issues to be addressed in the EIR. No areas of controversy were raised in the comments received.

Presented in Table ES-2, *Summary of NOP Responses and Scoping Meeting Comments*, is a summary of the comments received as part of the City scoping process. (Please see Appendix A for a copy of the NOP and letters received during its review, and Appendix B for a transcript of the public scoping session.)

Table ES-2. Summary of NOP Comments and Scoping Meeting Comments

Environmental Impacts	Mitigation Measures
Native American Heritage Commission – July 26, 2016	
This letter identified the requirements of Assembly Bill 52 and Senate Bill 18 and the need for tribal consultation for this project.	Tribal consultation was completed for this project in compliance with all requirements and is addressed in Section 5.16, <i>Tribal Cultural Resources</i> .
San Diego Association of Governments (SANDAG) – August 22, 2016	
This letter requests that bus routes and trolley service local to the project site are included in the EIR and that additional transportation demand management (TDM) strategies be considered. It also acknowledges receipt of the NOP and requests to be included in the distribution list of the EIR.	A traffic impact analysis was prepared for the proposed project and summarized in Section 5.2, <i>Transportation/Traffic Circulation/Parking</i> . In this section, local bus, trolley, and transit routes were taken into consideration and highlighted as an alternative mode of transportation. A TDM strategy has also been devised for this project and is included in Section 5.2
Department of Transportation – September 1, 2016	
This letter identifies that the proposed project site is in close proximity to the State Route 163/ Friars Road Interchanges Modification Project and included a link to the environmental document.	A traffic impact analysis was prepared for the proposed project and summarized in Section 5.2, <i>Transportation/Traffic Circulation/Parking</i> . Proximity of the referenced project to the proposed project was taken into account and used in the analysis of the proposed project's impacts to traffic.

Summary of Project Alternatives

ALTERNATIVES CONSIDERED BUT REJECTED

The *Alternatives* section (Section 9.0) of this EIR includes a discussion of alternatives which were considered early in the project design process but which have been rejected. This section includes an Alternative Location alternative, All Commercial alternative, PDO Multiple Use Zone Consistency alternative, and an Alternative Land Uses alternative. A brief summary is below. These alternatives were rejected from further consideration due to a lack of meeting most of the project objectives.

Alternative Location Alternative

Mission Valley is an essentially built-out community. With the exception of the Qualcomm Stadium site, the last remaining undeveloped properties are either currently being developed (such as Quarry Falls/Civita, which is currently being constructed as a large, master planned neighborhood

with a mix of residential, commercial retail, office, and park uses) or are planned for development under approved Specific Plans (such as the Riverwalk/Levi-Cushman Specific Plan). There are a number of smaller sites in the Mission Valley community where redevelopment could occur in a manner similar to that proposed by the Alexan Fashion Valley project. Like the project site, some of these sites have easy access to transit. Several of these sites are already considered for redevelopment/development by other owners/applicants, as presented in Section 6.0, *Cumulative Effects*, of this EIR. There are no other sites under the applicant's control to allow development of a mixed-use project that meets the project's objectives. Additionally, other sites within Mission Valley may not have the correct zoning and land use designation to allow development as a mixed-use project and would, therefore, require a rezone and/or amendment to the Mission Valley Community Plan and City of San Diego General Plan. For these reasons, there are no other alternative locations for the Alexan Fashion Valley project that would meet the project's objectives. Therefore, the Alternative Location alternative was rejected from further analysis.

All Commercial Development Alternative

An alternative was considered that would redevelop the project site as an all-commercial office project, as allowed within the existing land use designation and zone. In order to stay within the Threshold 2 traffic limits of the Mission Valley Planned District Ordinance (PDO) (i.e., no more than 2,050 ADT for the project site), almost twice the existing office development could occur on the project site. This alternative would be a mid-rise, multi-story office building or buildings, with 129,400 square feet of multi-tenant office.

Like the project, the All Commercial Development alternative would be consistent with the General Plan, Community Plan, and existing zoning. Less environmental impacts would result from this alternative with regards to land use (noise), as an All Commercial Development alternative would be compatible with the exterior noise environment and would not require measures to reduce noise levels to comply with City requirements for residential uses. The All Commercial Development alternative would generate 766 new trips, which would be 108 trips less than generated by the proposed project. However, this alternative would result in more AM peak hour PM peak hour trips. Therefore, this alternative would result in greater traffic impacts when compared to the proposed project. This alternative would not provide the mix of uses and, therefore, would not have the trip reducing and air quality benefits (such as reduced trip lengths to nearby services and amenities and opportunities for live-work that can result in a reduction in commute trips). There would be no impacts to public services associated with schools, libraries, and recreation as no residential development would occur. However, based on the analysis in this EIR, none of those effects would be regarded as significant under the proposed project. For all other issue areas (i.e., visual quality and neighborhood character, energy, geologic conditions, hydrology, water quality, paleontology, public utilities, tribal cultural resources and cumulative effects), the All Commercial Development alternative would result in the same level of environmental effects as the proposed project.

Although this alternative would meet some of the project objectives, this alternative would not provide a mix of commercial restaurant, office, and residential uses where access to other amenities and transit are within walking distance; would not result in maximizing residential development at an infill site; would not provide housing or live-work space with supporting amenities to allow for home/work businesses; would not enhance the potential of Camino de la Reina to function as a lively “main street” for the community; and would not create an environment that focuses on the pedestrian. Because the All Commercial Development alternative does not meet most of the project’s objectives and does not substantially reduce impacts, it was rejected from further analysis.

PDO Multiple Use Zone Consistency Alternative

An alternative was considered that would develop the project site as a similar mixed-use development project that maximizes development intensity in accordance with the Multiple Use (MV-M) Zone in the Mission Valley PDO.

Under the MV-M Zone in the Mission Valley PDO Guideline, no single land use should account for more than 60 percent, nor less than 20 percent of the ADT allocated to the project, based on the trip generation rates included in the PDO (Table 1514-03B, Development Intensity Factors). Additionally, the predominant land use should be consistent with the Community Plan land use designation (i.e., Commercial Office for the Alexan Fashion Valley project site). In order to meet these guidelines, the PDO Multiple Use Zone Consistency Alternative would result in 60 percent commercial office, 20 percent residential, and 20 percent commercial retail. The residential unit count would be reduced in this alternative from 284 units proposed by the project to 68 units that would occur under this alternative. The commercial office and commercial retail components would be increased to ensure that office use accounts for 60 percent of the ADT allocated to the site and commercial would account for 20 percent of the ADT allocated to the site, based on the PDO trip generation rates. Thus, approximately 61,500 square feet of commercial office use and 10,250 square feet of commercial restaurant use would also occur on the site under this alternative. The alternative could include some of the same features as the proposed project, such as the street landscape features, a separated pedestrian path along Camino de la Reina, and a focal point and/or pedestrian plaza at the entries to the project. However, due to the reduced number of residential units, the residential element of this alternative would be at a much smaller scale and would not support the type and amount of residential amenities proposed by the project.

Although this alternative would reduce AM peak hour trips, it would increase PM peak hour trips, which would result in greater traffic impacts than the proposed project. Due to the increase in traffic, this alternative would also result in greater air quality and GHG impacts. For all other environmental issue areas addressed in this EIR, environmental effects would be the same or similar to the proposed project. This alternative would meet all of the project objectives. However, this

alternative does not substantially reduce any environmental impacts and would significantly increase traffic impacts. Therefore, the PDO Multiple Use Zone Consistency alternative was rejected from further analysis.

Alternative Land Uses Alternative

The project proposes development under the Multiple Use Option of the Mission Valley Community Plan. The Multiple Use Option requires two or more significant revenue-producing uses such as retail, office, residential (either as rentals or condominiums), hotel/motel, and/or recreation—which, in well-planned projects, are financially supportive of the other uses. In order to determine if a different mix of uses would significantly reduce or avoid significant environmental impacts associated with the project, Alternative Land Use alternatives were considered that involved two land uses, rather than the three proposed by the project. The number and types of residential units (284 multi-family units) would be the same as the proposed project; however, the amount of non-residential space (11,295 square feet) would be either all commercial office use or all retail commercial space. Under both of these alternatives, the design and architecture of each alternative would be the same as that proposed by the project; the only change would be that either all commercial office space or all retail commercial space would occupy the non-residential portions of the project.

Development of the project site with 284 residential units and approximately 11,295 square feet of commercial office uses would not result in significantly reducing or avoiding significant environmental impacts associated with the proposed project. A mixed-use development with 284 residential units and approximately 11,295 square feet of commercial office uses would generate 745 ADT, which would be 129 ADT less than new ADT generated by the proposed project. Traffic impacts would not be significantly reduced, and mitigation measures like those required for the proposed project would still be necessary to reduce significant traffic impacts to below a level of significance. Because less traffic would be generated under this alternative, there would be a concomitant reduction in air quality, GHG emissions, and noise impacts. However, the analysis conducted in this EIR did not find significant impacts associated with those environmental issues. This alternative would meet nearly all of the project objectives; however, this alternative does not substantially reduce any environmental impacts. Therefore, an alternative that would develop the project site with 284 residential units and approximately 11,295 square feet of commercial office uses was rejected from further analysis.

In a similar manner, development of the project site with 284 residential units and approximately 11,000 square feet of retail commercial would not result in significantly reducing or avoiding significant environmental impacts associated with the proposed project. A mixed-use development with 284 residential units and approximately 11,000 square feet of retail commercial uses would generate 872 ADT, which would be two ADT less than the new ADT generated by the proposed project. Traffic impacts would not be significantly reduced, and mitigation measures like those

required for the proposed project would still be necessary to reduce significant traffic impacts to below a level of significance. This alternative would meet nearly all of the project objectives; however, this alternative does not substantially reduce any environmental impacts. Therefore, an alternative that would develop the project site with 284 residential units and approximately 11,000 square feet of retail commercial uses was rejected from further analysis.

ALTERNATIVES CONSIDERED

The alternatives addressed in Section 9.0 of this EIR include the discussion of the No Project alternative that is mandated by CEQA and other alternatives that were developed in the course of project planning and environmental review for the proposed project. Specifically, the following project alternatives are addressed in this EIR:

- Alternative 1 – No Project/No Build
- Alternative 2 – Reduced Density Alternative

Alternative 1 – No Project/No Build Alternative

Under the No Project/No Build alternative, the project would not be implemented on the site. The office buildings would not be demolished and would be left as they are today.

When compared to the proposed Alexan Fashion Valley project, the No Project/No Build alternative would eliminate the potential for direct significant impacts to historical resources and tribal cultural resources as no new development would occur. The No Project/No Build alternative would also eliminate the potential for a cumulative impact to traffic circulation on two street segments. The No Project/No Build alternative would also reduce environmental effects associated with air quality and GHG, as no new trips would occur under this alternative; and there would be no impacts to public services associated with schools, libraries, and recreation as no residential development would occur. However, based on the analysis in this EIR, none of those effects would be regarded as significant under the proposed project. The No Project/No Build alternative has the potential to result in slightly greater impacts to visual quality and neighborhood character and energy, although such impacts would not reach a level of significance. The No Project/No Build alternative would not include design features directed at avoiding impacts associated with soil liquefaction. Hydrological impacts associated with flooding would be greater, as the existing development is not elevated out of the floodplain; and impacts associated with water quality would be greater due to larger amounts of open parking areas and lack of current required storm water quality control measures. For all other issue areas (i.e., paleontology, public utilities, and cumulative effects), the No Project/No Build alternative would result in the same level of environmental effects as the proposed project. The No Project/No Build alternative would not meet any of the project objectives.

Alternative 2 – Reduced Density Alternative

A Reduced Density alternative was evaluated in order to determine if reducing the project's proposed residential density while still attaining most of the project's basic objectives would reduce and/or avoid significant traffic impacts on Camino de la Reina associated with the project. Project impacts to geologic conditions (liquefaction), historical resources (archaeological), and tribal cultural resources (archaeological) cannot be reduced and/or avoided with any redevelopment of the project site and are therefore not discussed as part of this alternative. As concluded in the TIA and Section 5.2, *Transportation/Traffic Circulation/Parking*, of this EIR, the proposed project would result in two horizon year (2035) cumulative impacts on Camino de la Reina between Hotel Circle North and Driveway 1 and the on Camino de la Reina between Driveway 2 and Avenida del Rio.

The Reduced Density alternative would include a mix of residential, commercial office, and commercial retail uses, like the proposed project. However, this alternative would reduce the number of residential units by 57 percent, from 284 units in the proposed project to 121 units in this alternative. Commercial office and commercial retail square footage would be the same as the proposed project. Development under this alternative would be more traditional with regards to the unit make-up and design and would not provide the mix and type of housing provided by the project. As such, this alternative would eliminate the residential-work units and amenities that are included in the proposed project related to supporting home-business uses. This alternative would implement requirements of the San Diego Municipal Code related to the provision of private and common open space areas. However, the amount of common outdoor amenity space provided to residents would be commensurately reduced, resulting in either one consolidated amenity area (versus the two provided with the proposed project) or two amenity areas of greatly reduced size and features. Additionally, due to the overall reduction in the development intensity, this alternative would not offer quasi-public amenities, such as the elevated pedestrian plaza fronting on Camino de la Reina. The Reduced Density alternative would result in construction of a mixed-use building, parking structure, and associated surface parking. Due to the reduced development intensity, the parking structure may be wrapped, as with the project, or may be a stand-alone/exposed structure, depending on the specific design of the reduced residential component. Because less parking would be needed to support the reduction in residential units, this alternative would be served by a greater amount of surface parking. Like the proposed project, the design of the project under this alternative would occur in a manner compatible with surrounding buildings in west-central Mission Valley and access would be taken from the Camino de la Reina.

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

public services due to a smaller residential population. However, those issue areas were not found to be significant in the analysis in the EIR. This alternative would not implement land use goals of the General Plan to the extent associated with the proposed project. For all other issue areas (i.e., visual quality and neighborhood character, noise, energy, geologic conditions, hydrology, water quality, paleontology, public utilities, historical, tribal cultural resources, and public services and facilities), the Reduced Density alternative would result in the same level of environmental effects as the proposed project.

This alternative would meet six of the 11 project objectives. It would not provide opportunities for live-work space, with supporting amenities, not currently available in the Mission Valley community, nor would it provide for a mix and type of residential units currently unavailable in the community. The Reduced Density alternative would not maximize the efficiency in use of the project site, nor would it cluster high-density housing opportunities in the Mission Valley community. It would also not create a focal point/pedestrian plaza that functions as a space for social gatherings.

Environmentally Superior Alternative

The environmental analysis of alternatives presented above is summarized in Table 9-6, *Comparison of Alternatives to Proposed Project*. CEQA requires that the EIR identify the environmentally superior alternative among all of the alternatives considered, including the proposed project. If the No Project alternative is selected as environmentally superior, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

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

CEQA requires that, if the No Project alternative is selected as environmentally superior, then the EIR shall also identify an environmentally superior alternative among the other alternatives. For the Alexan Fashion Valley project, the Reduced Density alternative would be selected as the environmentally superior alternative to the proposed project. The Reduced Density alternative would reduce cumulatively significant impacts to traffic. The Reduced Density alternative would result in the development of 163 less residential units thereby reducing the effect of redeveloping the project site to create much needed housing opportunities in the Mission Valley community where transit and other amenities are readily available.

1.0 INTRODUCTION

1.1 Purpose and Legal Authority

This Environmental Impact Report (EIR) is an informational document intended for use by the City of San Diego decision-makers and members of the general public in evaluating the potential environmental effects of the Alexan Fashion Valley project. This document has been prepared in accordance with, and complies with, all criteria, standards, and procedures of the California Environmental Quality Act (CEQA) of 1970 as amended [Public Resources Code (PRC) 21000 et seq.], State CEQA Guidelines [California Administrative Code (CAC) 15000 et seq.], and the City of San Diego's EIR Preparation Guidelines. In accordance with CEQA Guidelines Section 15161 and as determined by the City of San Diego, this document constitutes a "Project EIR." The Alexan Fashion Valley project proposes an in-fill development with 284 dwelling units (including 48 units with a home business focus) constructed in "wrap design" around a central parking structure, 8,150 square feet of commercial office use, and 3,145 square feet of restaurant use within the Mission Valley Community Plan area. (For a full description of the proposed project, please see Section 3.0, *Project Description*.)

The Alexan Fashion Valley project requires a Site Development Permit and a Planned Development Permit with action by the Planning Commission (Process Four). This EIR provides decision-makers, public agencies, and the general public with detailed information about the potential significant adverse environmental impacts of the proposed Alexan Fashion Valley project. By recognizing the environmental impacts of the proposed project, decision-makers will have a better understanding of the physical and environmental changes that would accompany implementation of the project. This EIR includes required mitigation measures which, when implemented, would lessen or avoid project impacts. Alternatives to the proposed project are presented to evaluate feasible alternative development scenarios that can further reduce or avoid any significant impacts associated with the project.

1.1.1 Notice of Preparation and Scoping Meeting

As discussed in the Executive Summary, a Notice of Preparation (NOP) was prepared for the project and was distributed to all Responsible and Trustee Agencies, as well as other agencies and members of the public who may have an interest in the project. The purpose of the NOP was to solicit comments on the scope and analysis to be included in the EIR for the proposed Alexan Fashion Valley project. A copy of the NOP and letters received during its review are included in Appendix A of this EIR.

In addition, comments were also gathered at a public scoping session held for the project on August 8, 2016 at the project site. A transcript of this public scoping meeting is included in Appendix B.

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

1.1.2 Authority and Intended Uses of the EIR

Per Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the State CEQA Guidelines, the City of San Diego is the Lead Agency under whose authority this document has been prepared. The analysis and findings in this document reflect the independent analysis and conclusions of the City of San Diego. This EIR discusses the potential significant adverse effects of the project. Where environmental impacts have been determined to be potentially significant, mitigation measures directed at reducing or avoiding significant adverse environmental effects have been identified. In addition, feasible alternatives to the proposed project have been developed, including the *No Project/No Build* alternative and an *All Commercial Development* alternative. An analysis of the impacts of project alternatives compared to those of the proposed project provides a basis for consideration by decision-makers.

1.1.3 Availability and Review of the Draft EIR

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

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

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

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

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

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

This EIR has been made available for review to members of the public and public agencies for 30 calendar days to provide comments "*on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.*" (14 CCR 15204). (Note: The City has determined that the project is not of

Statewide, Regional, or Areawide significance. In accordance with CEQA Guidelines Section 15206, submittal of the EIR to the State Clearinghouse is not required, and therefore a 30-day public review period has been established.) Following the public review period, responses to the public review comments relevant to the adequacy and completeness of the EIR are prepared and compiled into the Final EIR. The City of San Diego Planning Commission, prior to any final decision on the project, will consider the Final EIR for certification.

1.2 Scope and Content of EIR

1.2.1 *Scope of EIR*

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

- Land Use
- Transportation/Traffic Circulation/
Parking
- Visual Effects/Neighborhood
Character
- Air Quality
- Global Climate Change
- Energy
- Noise
- Geologic Conditions
- Paleontological Resources
- Historical Resources
- Hydrology
- Water Quality
- Public Services and Facilities
- Public Utilities
- Health and Safety
- Tribal Cultural Resources
- Cumulative Effects

1.2.2 *Format of EIR*

In accordance with Sections 15120 through 15132, this EIR is formatted to address the required contents of an EIR. Specifically, an *Executive Summary* is provided at the beginning of this document. The summary includes the conclusion of the environmental analysis and a comparative summary of the project with the alternatives analyzed in the EIR, as well as areas of controversy and any issues to be resolved. Section 1.0, *Introduction*, introduces the purpose of the EIR, provides a discussion of the public review process, and includes the scope and format of the EIR. The *Environmental Setting*, Section 2.0, provides a description of the project location and the environment of the project site, as well as the vicinity of the project site, as it exists before implementation of the proposed project. Section 3.0, *Project Description*, details the physical and operational characteristics of the project, provides the purpose and objectives of the project, and presents the required discretionary actions. Section 4.0, *History of Project Changes*, chronicles any changes that have been made to the project in response to environmental concerns raised during the City's review of the project. Section 5.0, *Environmental Analysis*, includes a description of the existing conditions relevant to each

environmental topic; presents the threshold(s) of significance, based on the City of San Diego's CEQA Significance Determination Thresholds, for the particular issue area under evaluation; identifies an issue statement or issue statements; assesses any impacts associated with implementation of the project; provides a summary of the significance of any project impacts; and presents recommended mitigation measures and mitigation monitoring and reporting, as appropriate, for each significant issue area. *Cumulative Effects* are presented under a separate discussion section (Section 6.0) based on issues that were found to be potentially cumulatively significant. Section 7.0, *Effects Not Found to be Significant*, presents a brief discussion of the environmental effects of the project that were evaluated and were found not to be potentially significant. The EIR also includes a mandatory CEQA discussion of *Significant Irreversible Environmental Changes* (Section 8.0), as well as a discussion of project *Alternatives* (Section 9.0) which could avoid or reduce potentially significant environmental impacts associated with implementation of the project. Section 10.0, *Mitigation Monitoring and Reporting Program*, documents the various mitigation measures required as part of the project. Section 11.0, *References*, includes a list of the reference materials consulted in the course of the EIR's preparation is included in this section; and Section 12.0, *Individuals and Agencies Consulted*, includes a list of those agencies and individuals contacted during preparation of the EIR are identified in this section. Section 13.0, *Certification*, lists those persons and agencies responsible for the preparation of the EIR.

1.3 Responsible and Trustee Agencies

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

2.0 ENVIRONMENTAL SETTING

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

CEQA Guidelines Section 15125(a) guides the discussion of the environmental setting for the proposed project and advises in the establishment of the project baseline. According to CEQA, “[a]n EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published[...]. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” Baseline condition for the Alexan Fashion Valley project is the fully developed site as established in this *Environmental Setting* section.

2.1 Regional Setting

The Alexan Fashion Valley project is located in the Mission Valley community of the City of San Diego, within San Diego County (see Figure 2-1, *Regional Map*). The City of San Diego covers approximately 206,989 acres in the southwestern section of San Diego County, in Southern California. The City is located approximately 17 miles north of the United States-Mexico border and is bordered on the north by the City of Del Mar, the City of Poway, and unincorporated San Diego County land. On the east, the City of San Diego is bordered by the cities of Santee, El Cajon, La Mesa, and Lemon Grove, as well as unincorporated County of San Diego land. To the south, San Diego is bordered by the cities of Coronado, Chula Vista, and National City, as well as the United States-Mexico border. The Pacific Ocean is the City of San Diego’s western border.

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

2.2 Project Location and Surrounding Land Uses

As shown in Figure 2-3, *Project Location Map*, the Alexan Fashion Valley project site is located at 123 Camino de la Reina. Situated north of the Interstate 8 (I-8)/State Route 163 (SR-163) interchange, south and east of Camino de la Reina, and west of SR-163, the Alexan Fashion Valley project site encompasses approximately 4.92 acres. The Union-Tribune building is located west of the project site and to the north is the San Diego River and Fashion Valley Mall, a regional mall providing upscale shops and a variety of restaurants, as well as a transit center with bus and light rail transit (LRT) stations. The I-8/SR-163 interchange is located east and south of the project site. Farther east of the project site, beyond the freeway interchange, is a four-story commercial office building and a 12-story commercial office building with a mixture of surface and structured parking. Farther east of the project site are car dealerships; multi-family housing development; the approved Camino Del Rio Mixed Use project under construction as the “Millennium Mission Valley” project; and Westfield Mission Valley West shopping center, which provides a mix of commercial shops and restaurant establishments. LRT stations are located across Camino de la Reina from Hazard Center Station, as well as at the Fashion Valley Mall located northwest of the project site.

Regional access to the site is I-8, located immediately south of the project site; SR-163, located immediately east of the project site; and I-805, located approximately two miles east of the project site. Local project access is provided via Camino de la Reina, which fronts the project along the north and west. Three driveways provide access to the project site from Camino de la Reina.

2.3 Existing Site Conditions

The Alexan Fashion Valley project site encompasses approximately 4.92 acres. The site has been previously graded and is fully developed with 69,651 square feet of office buildings and on-site surface parking. Landscaping includes turf, trees, and non-native ornamental vegetation. Figure 2-4, *Existing Site Conditions*, depicts the current development on the project site.

2.4 Public Services

2.4.1 Police

The project site is served by Beat 623 of the Western Division facility of the San Diego Police Department, located at 5212 Gaines Street. The Western Division serves the neighborhoods of Hillcrest, La Playa, Linda Vista, Loma Portal, Midtown, Midway District, Mission Hills, Mission Valley West, Morena, Ocean Beach, Old Town, Point Loma Heights, Roseville-Fleetridge, Sunset Cliffs, University Heights and Wooded Area. The Western Division serves a population of 129,709 people and encompasses 22.7 square miles. This police station is located approximately 2.5 miles west of the project site. See Section 5.13, *Public Services and Facilities*, for a more detailed discussion of police services.

2.4.2 Fire Safety

Two fire stations serve the project site. Station Number 45 is located at 9366 Friars Road, approximately three miles east of the project site. Station 45 is equipped with an engine. Station Number 5 is located at 3902 Ninth Avenue, approximately two miles south of the project site. Station 5 is equipped with an engine and battalion. See Section 5.13, *Public Services and Facilities*, for a more detailed discussion of fire services.

2.4.3 Library Services

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

2.4.4 School Services

Public school service would be provided by San Diego Unified School District. There are no public schools located within Mission Valley. The schools that would serve the project area are located in the adjacent communities of Serra Mesa and Kearny Mesa. Specifically, public schools serving the project area are Jones Elementary School, located in the Serra Mesa community at 2751 Greyling Drive; Taft Middle School, located in the Serra Mesa community at 9191 Gramercy Drive; and Kearny High Complex, located in the Kearny Mesa community at 7651 Wellington Way. There are three charter schools located in the Mission Valley area: Audeo Charter School, located at 7510-7610 Hazard Center Drive, Dehesa Charter School, located at 4646 Mission Gorge Place, and San Diego Cooperative Charter School, located at 7260 Linda Vista Road.

2.4.5 Recreation

The General Plan's *Recreation Element* addresses the preservation, protection, acquisition, development, operation, maintenance, and enhancement of public recreation opportunities and facilities throughout the City for all users. Mission Valley contains one public recreational amenity, Sefton Field, which houses four little league fields located approximately three miles west of the project site, north of Friars Road. A future public park is planned for the Civita development, located approximately one mile northeast of the project site. In addition, the San Diego River Park Master Plan is located north of the project site along the San Diego River. Included as part of the San Diego River Park Master Plan is an integrated and connected trail system, which will provide additional opportunities for access to and recreation along the San Diego River.

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

2.5 Planning Context

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

2.5.1 City of San Diego General Plan

The City's General Plan sets forth a comprehensive, long-term plan that prescribes overall goals and policies for development within the City of San Diego. The General Plan contains the following Elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; and Historic Preservation. The General Plan identifies the project site as Commercial Employment, Retail, and Services (Figure 2-5, *City of San Diego General Plan Land Use Map*).

2.5.2 City of San Diego Climate Action Plan

In December 2015, the City of San Diego adopted its Climate Action Plan (CAP). The CAP includes a municipal operations and community-wide GHG emissions baseline calculation from 2010 and sets a target to achieve a 15 percent reduction from the baseline by 2020, as required by California Assembly Bill 32. The CAP sets forth common-sense strategies to achieve attainable greenhouse gas reduction targets and outlines the actions that City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions.

The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's

incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. In July 2016, the City adopted the CAP Consistency Checklist (Checklist) to provide a streamlined review process for the analysis of potential GHG impacts from proposed new development.

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

2.5.3 Mission Valley Community Plan

The project site is governed by the Mission Valley Community Plan. The Mission Valley Community Plan encompasses approximately 2,418 net acres. The community is a regional center of office, hotels, retail sales, and a growing residential community, tied together by the San Diego Trolley. The Mission Valley Community Plan is currently undergoing an update process. The update process is scheduled to be completed in the Fall of 2018.

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

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

2.5.4 Zoning

Zoning for the Alexan Fashion Valley project site is governed by the City's Land Development Code, specifically the Mission Valley Planned District Ordinance (MVPDO). Within the Mission Valley community, the project site is zoned MV-CO (See Figure 2-7, *Existing Zoning*.) The purpose of the MV-CO zone is to provide for business and professional offices and certain allied services normally associated with such offices. The Mission Valley PDO limits development intensity based on average daily traffic (ADT) and the Development Intensity District in which the project is located. The project is located in Development Intensity District C. According to Table 1514-03A in the MVPDO, up to 417 ADT per gross acre is allowed within development threshold 2. For the 4.92-acre project site, the Community Plan would allow up to 2,052 ADT within the allowable development thresholds.

2.6 Regional Plans

This section provides a brief overview of the regional planning context relevant to the proposed project. For a detailed discussion, see Section 5.1, *Land Use*, and Section 5.15, *Health and Safety*.

2.6.1 Montgomery Field ALUCP

The Alexan Fashion Valley project site is located within the Airport Influence Area identified in the Airport Land Use Compatibility Plan (ALUCP) for Montgomery Field (Figure 2-8, *Montgomery Field ALUCP Airport Influence Area*). The City of San Diego implements the ALUCP policies and criteria with the Supplemental Development Regulations contain in the Airport Land Use Compatibility Overlay Zone (Chapter 13, Article 2, Division 15 of the City's Municipal Code). There are two Review Areas for Montgomery Field. The project site is located within Review Area 2. Review Area 2 involves airspace protection and overflight compatibility. See Section 5.15, *Health and Safety*, for a detailed discussion of project compatibility with the Montgomery Field ALUCP.

2.6.2 San Diego International Airport ALUCP

The Alexan Fashion Valley project site is located within the Airport Influence Area (AIA) Review Area 2 identified in the ALUCP for San Diego International Airport (Figure 2-9, *San Diego International Airport ALUCP Airport Influence Area*). The basic function of the ALUCP (2014) is to promote compatibility between airports and the land uses that surround them to the extent that these areas are not already devoted to incompatible land uses. The ALUCP safeguards the general welfare of the inhabitants within the vicinity of San Diego International Airport and the public in general. (See Section 5.1, *Land Use*, for a discussion of the project site's relationship with the San Diego International Airport ALUCP.) The ALUCP provides policies and criteria for the City of San Diego to implement and for the Airport Land Use Commission (ALUC) to use when reviewing development proposals. See Section 5.15, *Health and Safety*, for a detailed discussion of project compatibility with the San Diego International Airport ALUCP.

2.6.3 San Diego River Park Master Plan

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

The Master Plan covers the 17.5-mile stretch of the San Diego River and includes two distinct planning areas, called the River Corridor Area and the River Influence Area. The River Corridor Area consists of the 100-year floodway along both sides of the river, plus 35-foot path corridor on each side. The River Influence Area consists of the first 200 feet adjacent to the River Corridor Area, also on both sides of the River. A portion of the project site is located within the River Influence Area and is separated from the Master Plan area and San Diego River by Camino de la Reina and the Union-Tribune complex development located north of the project. See Section 5.1, *Land Use*, for a complete analysis of project compatibility with the San Diego River Park Master Plan.

2.6.4 San Diego Regional Air Quality Strategy

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

2.6.5 San Diego Forward: The Regional Transportation Plan (RTP)/Sustainable Communities Strategy

The 2050 Regional Transportation Plan/Sustainable Communities Strategy (2050 RTP/SCS) San Diego Forward: The Regional Transportation Plan (Regional Plan) is the blueprint for a regional transportation system, serving existing and projected residents and workers within the San Diego region over the next 40 years that further enhances quality of life and offers more mobility options for people and goods. The 2050 RTP/SCS looks 40 years ahead, accommodating another 1.2 million residents, half a million new jobs, and nearly 400,000 new homes. The 2050 RTP/SCS envisions most of these new jobs and homes situated in sustainable communities, conducive to transit, walking, and bicycling. To achieve this, future growth will be more compact in nature, focused in the western portion of the region and along major transit and transportation corridors. This more compact development pattern will create more active mixed-use communities, while allowing for the protection of more open space land in the eastern portion of the region. Combines the region's two most important existing planning documents: the Regional Comprehensive Plan (RCP) and the Regional Transportation Plan and its sustainable Communities Strategy (RTP/SCS). The RCP, adopted

in 2004, laid out key principals for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas including urban form, transportation, housing, healthy environment, economic prosperity, public facilities, the borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the Regional Plan. On April 24, 2015, SANDAG released the Draft Regional Plan for public comment, with a closing date of July 15, 2015. A final Regional Plan was adopted by the SANDAG Board of Directors on October 9, 2015.

2.6.6 Regional Comprehensive Plan

The Regional Comprehensive Plan (RCP) serves as the long-term planning framework for the San Diego region. It provides a broad context in which local and regional decisions can be made that move the region toward a sustainable future. The RCP integrates local land use and transportation decisions and focuses attention on where and how the region should grow. The RCP contains an incentive-based approach to encourage and channel growth into existing and future urban areas and smart growth communities.

2.6.6.7 Water Quality Control Plan for the San Diego Basin

The San Diego Regional Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy; (3) describes implementation programs to protect the beneficial uses of all waters in the Region; and (4) describes surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan [California Water Code sections 13240 thru 13244, and section 13050(j)]. Additionally, the Basin Plan incorporates by reference all applicable State and Regional Board plans and policies. See Section 5.12, *Water Quality*, for a complete analysis of project compatibility with the applicable water quality control regulations.

2.0 ENVIRONMENTAL SETTING

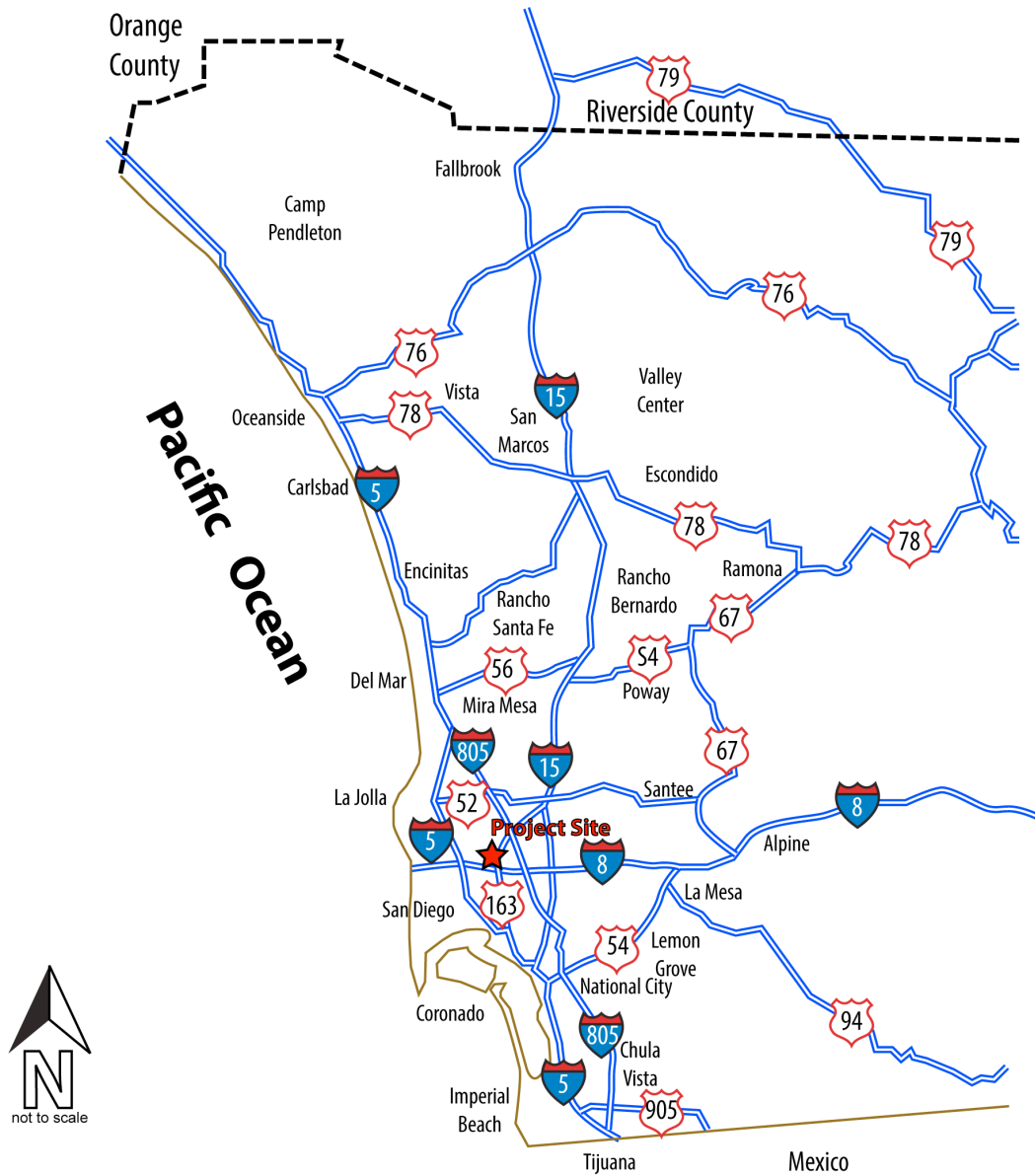


Figure 2-1. Regional Map

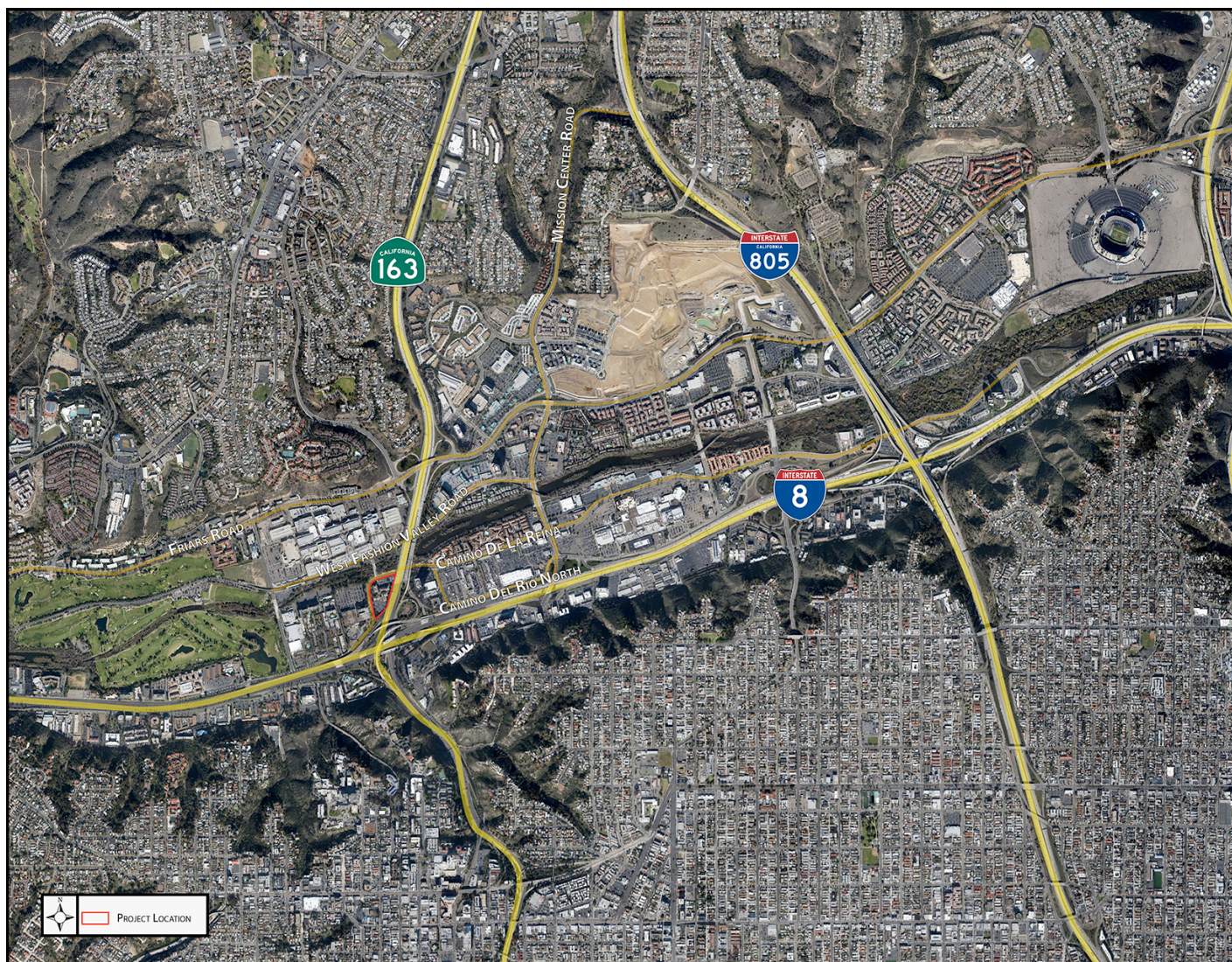


Figure 2-2. Vicinity Map

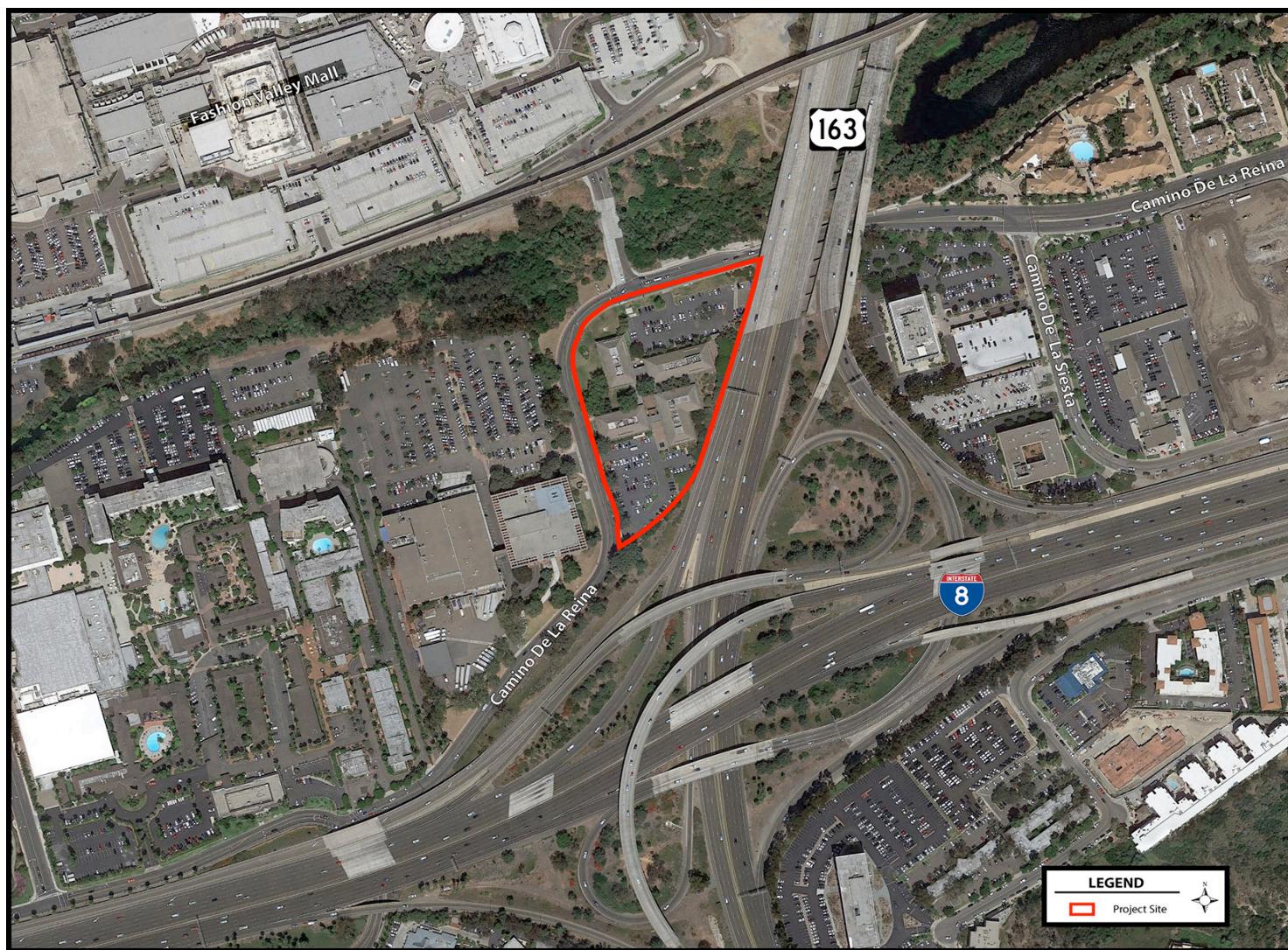
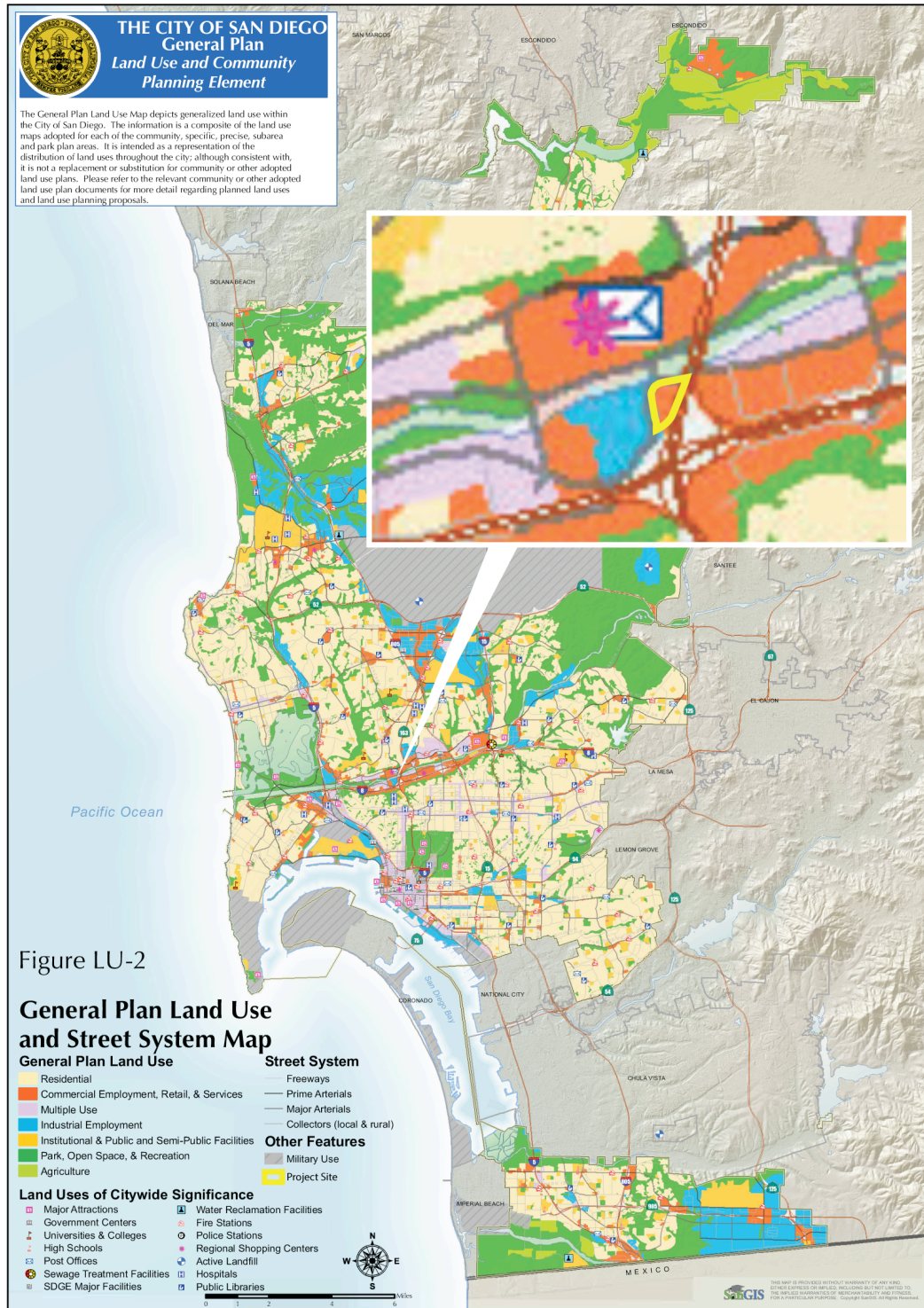
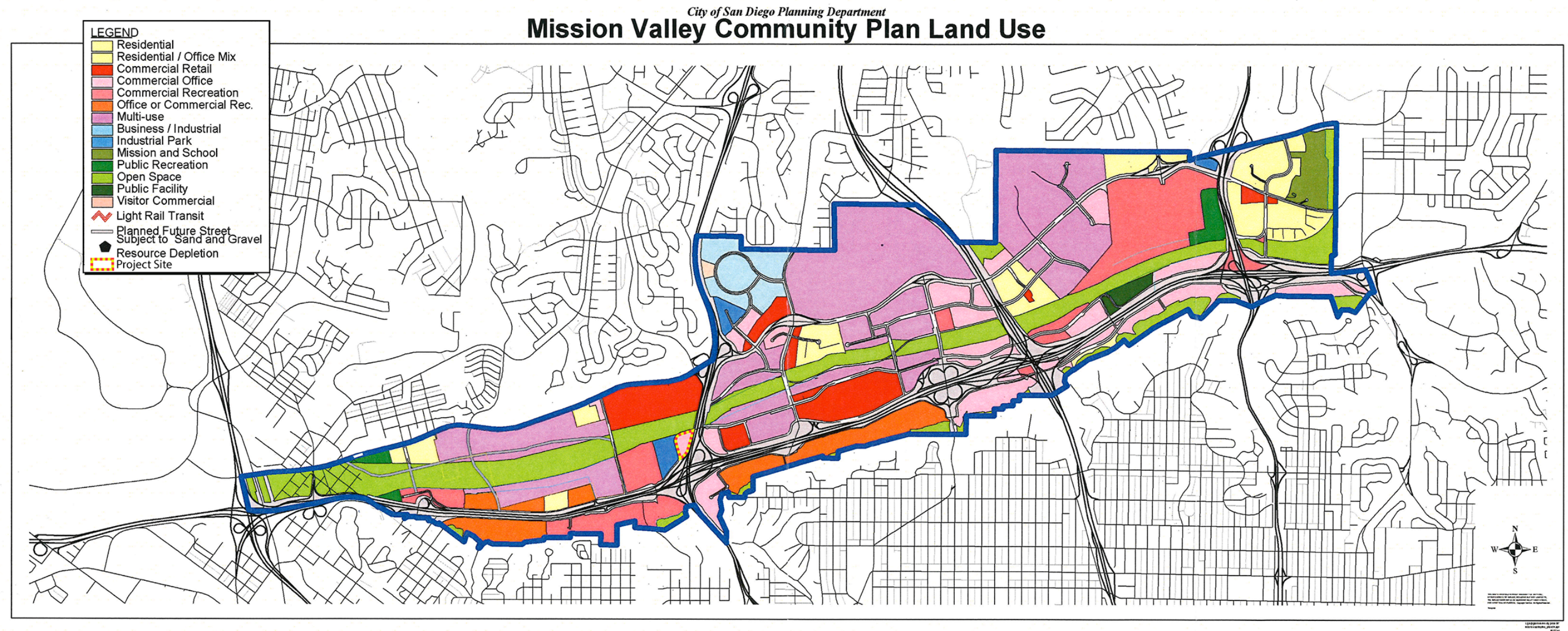


Figure 2-3. Project Location Map



Figure 2-4. Existing Site Condition





**Figure 2-6. Mission Valley Community Plan
Land Use Map**

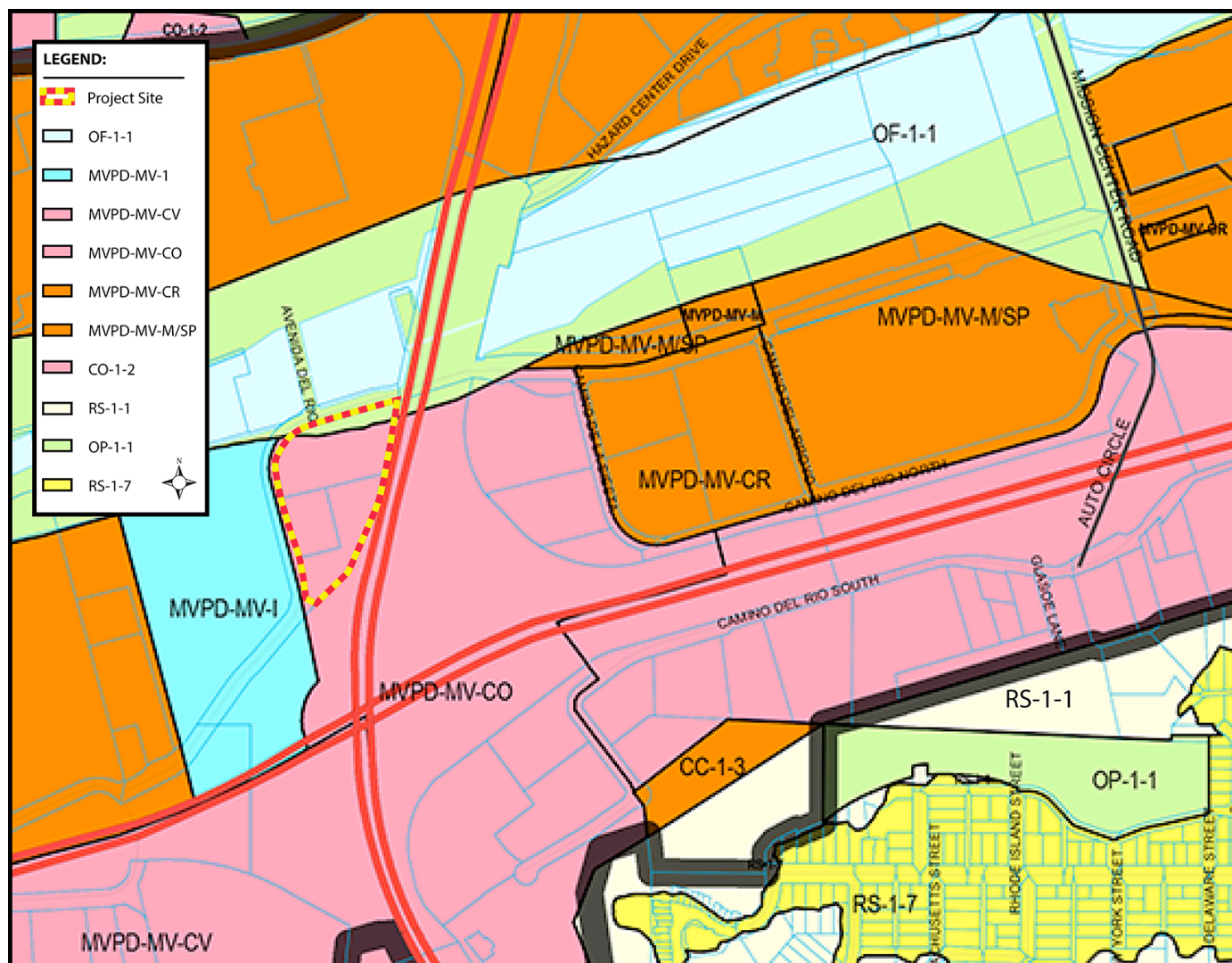


Figure 2-7. Existing Zoning

2.0 ENVIRONMENTAL SETTING

CHAPTER 3 MONTGOMERY FIELD POLICIES AND MAPS

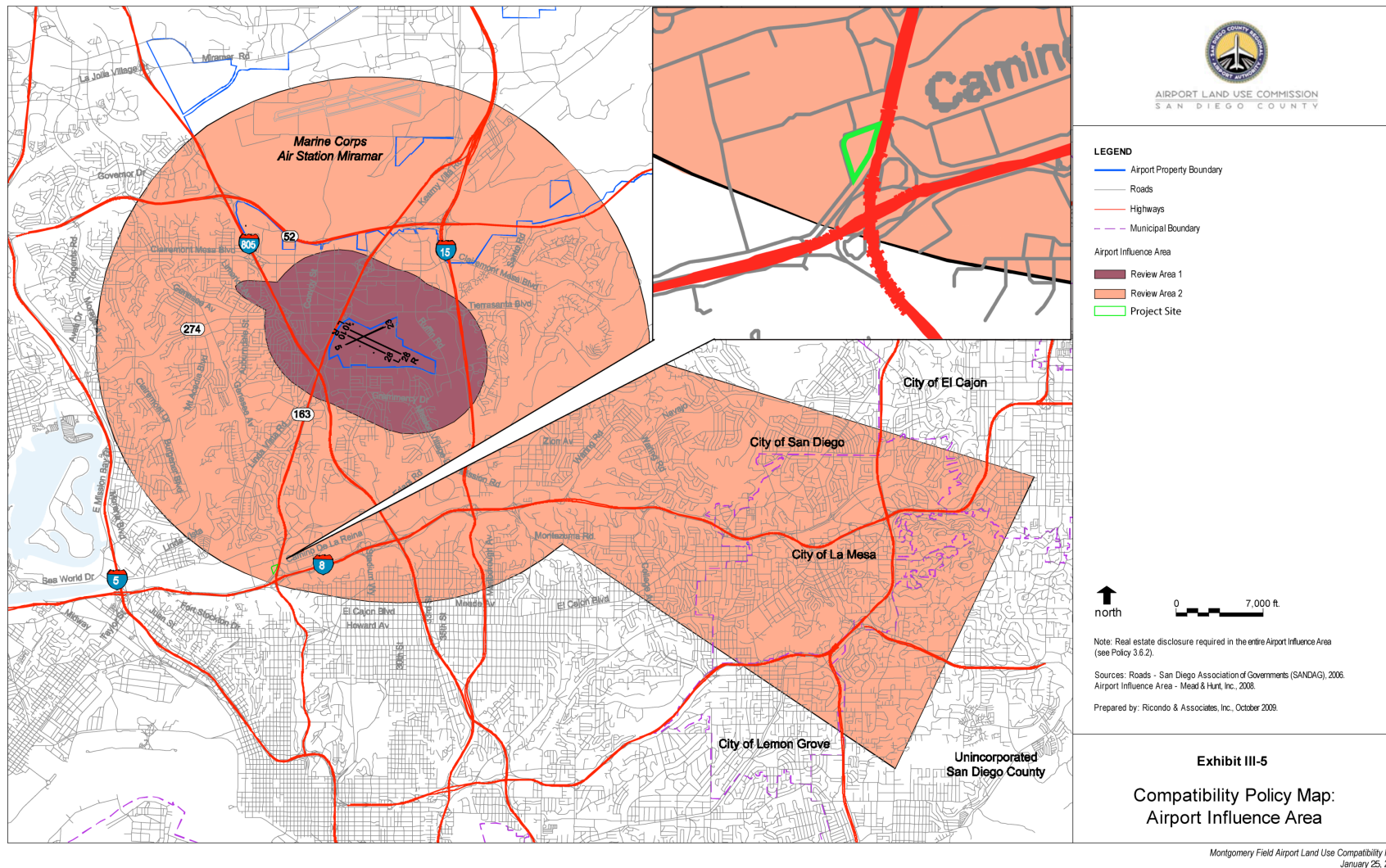


Figure 2-8. Montgomery Field ALUCP Airport Influence Area

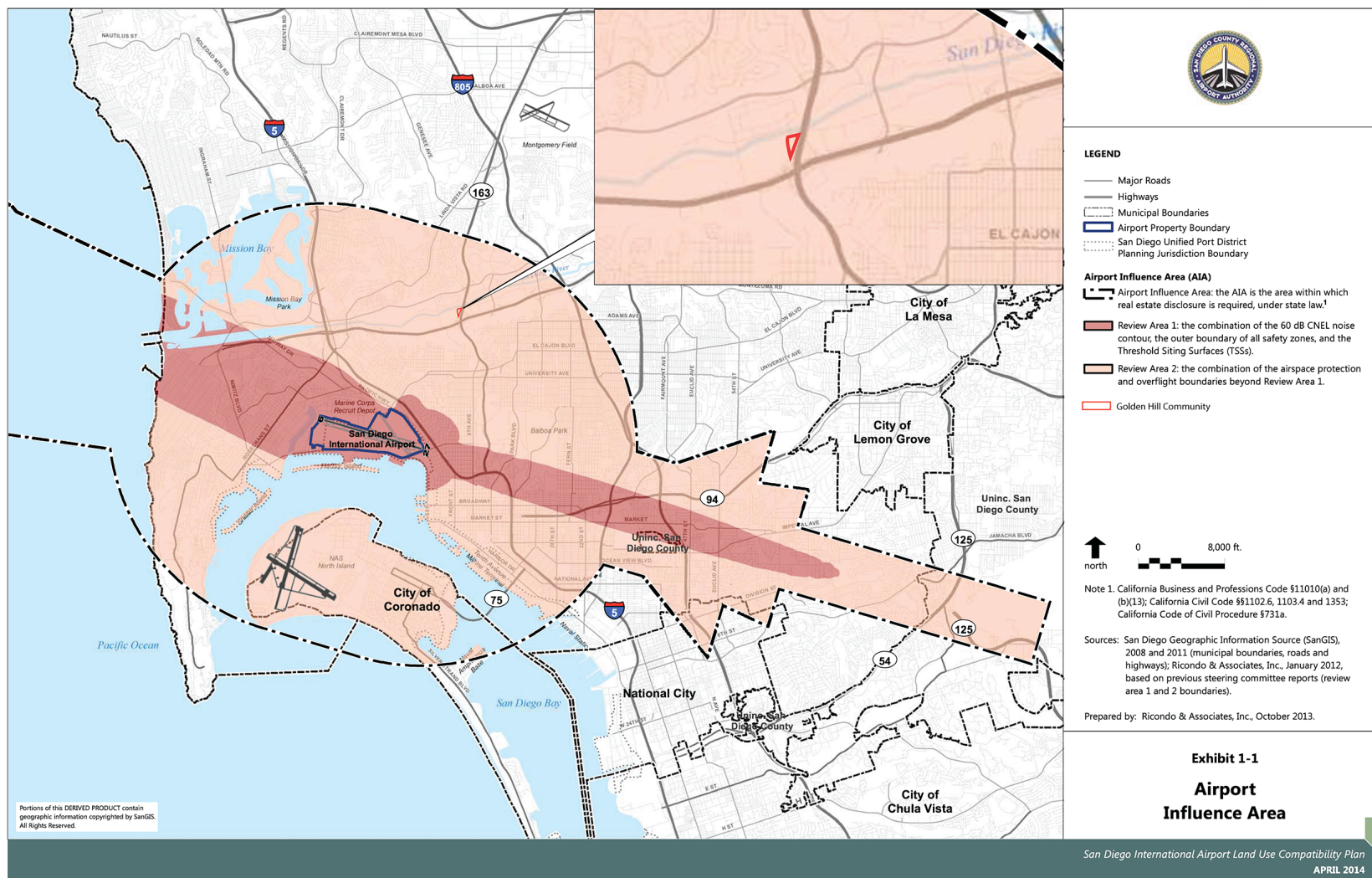


Figure 2-9. San Diego International Airport ALUCP Airport Influence Area

3.0 PROJECT DESCRIPTION

This EIR analyzes potential environmental effects associated with the proposed Alexan Fashion Valley project, located on 4.92 acres at 123 Camino de la Reina in the Mission Valley community, San Diego, California. The Alexan Fashion Valley project site is the location of current development in the form of existing commercial structures (69,651 square feet) and on-site surface parking. Figure 2-4, *Existing Site Conditions*, shows the development that has occurred and the project site to date.

3.1 Purpose and Objectives of the Proposed Project

CEQA Guidelines require that the Project Description include a statement of the objectives sought by the proposed project. A clearly defined written statement of the objectives helps the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR and aids decision-makers in preparing findings and overriding considerations, as necessary. The statement of objectives also needs to include the underlying purpose of the project [CEQA Guidelines Section 15124(b)].

3.1.1 Project Purpose

The purpose of the Alexan Fashion Valley project is to create a transit oriented development with a mix of residential and commercial retail and office uses that would serve the Mission Valley community. The project's location and proposed uses provide in-fill in a location where all utilities and public services, as well as transit, are readily available and within walking distance. Additionally, the project offers opportunities and supporting amenities that serve home businesses, which are not available in the current marketplace.

3.1.2 Project Objectives

The project objectives associated with the Alexan Fashion Valley project are as follows:

- Create a coherent and cohesive building site and site design that is compatible in scale and character and enhances the existing community character in the Mission Valley community.
- In keeping with the City of Villages and Smart Growth policies, provide for a mix of commercial retail, office, and residential uses as in-fill development of an underutilized site within an urban area where public facilities, transit, and services are readily available and easily accessed via alternative modes of travel, including transit, bike, and pedestrian.
- Provide opportunities for live-work space, with supporting amenities, not currently available in the Mission Valley community.
- Maximize efficiency in use of the project site.
- Redevelop the project site to cluster high-density housing opportunities in the Mission Valley community where transit and other amenities are readily available.
- Enhance this portion of the Mission Valley community by creating a "Main Street" feel along Camino de la Reina, with buildings that address the street.

- Create a focal point/pedestrian plaza that functions as a space for social gathering.
- Utilize architecture and design elements to ensure high quality design and aesthetics.
- Create additional retail and job opportunities in the Mission Valley community.
- Provide retail amenities for the adjacent employment and residential uses that are not only within walking distance but also capture drive-by automobile trips and walk-up trips from adjacent properties, thereby reducing the amount of routine daily trips.
- Provide for a mix and type of residential units currently unavailable in the community.

3.2 Project Characteristics

3.2.1 Site Plan

The project involves the demolition of existing structures (69,651 square feet) and on-site surface parking and the construction of a mixed-use development consisting of residential and commercial office and retail uses. The project would range in height from five to six stories with mezzanines on the seventh, wrapped around a six-story parking garage, and would have a total of 284 residential units (including 48 units with a home business focus), 8,150 square feet of commercial (office use) and 3,145 square feet of commercial (restaurant use) (see Figure 3-1, *Alexan Fashion Valley Site Plan*).

Residential units for the project would be provided in a variety of forms. Studio, one-bedroom, and two-bedroom units would be provided. Additionally, the project introduces residential-work units designed to accommodate individuals who operate businesses from a home office. Residential-work units would be coupled with shared open-office amenity areas to support a working environment. All units except those facing the freeway would have private outdoor space in the form of balconies totaling 19,408 square feet, with an additional 30,470 square feet in common open area. Additionally, the project would provide a total of 7,995 square feet of residential amenity space, including 2,188 square feet of fitness center and a 2,865 square foot residential/residential work lobby. In order to support the residential-work units, the project would provide a total of 2,940 square feet of business center space in three separate business center areas. Figure 3-2, *Alexan Fashion Valley Ground Level Plan*, and Figure 3-3, *Alexan Fashion Valley Level 2 Plan*, show the locations of these various amenity areas. The remaining amenity space would be interspersed throughout the project site within six focused amenity areas:

- The Meadow
- The Pool
- The Oasis
- The Nest
- Nature Walk
- The Perch

3.0 PROJECT DESCRIPTION

The six different amenity areas would be used by residents, employees, and visitors to the site. Two of these amenity areas would be private and would serve the residents of the project: The Meadow and The Pool. The Meadow, located in the northeastern portion of the project, would provide for passive recreation and gathering space for project residents. The Meadow would include a BBQ grill and outdoor dining space, as well as lounge seating, a fire pit, and lawn area. The Pool, located in the western portion of the project site, would provide the traditional amenities of a multi-family project (a pool and spa) with the addition of a BBQ grill.

The Oasis and The Nest are intended to serve both project residents and employees, as well as patrons of the project's retail offerings. The Oasis, located between the leasing office, fitness center, and office components in the southern portion of the project site, would provide a plaza-like setting with a wood deck, seating, and a bar top counter. The Nest, located in the southwest corner of the project site, would provide an outdoor dining patio adjacent to the project's restaurant component, as well as a specimen tree to provide ambience. (See Figure 3-5, *Amenity Area Enlargement Plans*, for detailed depictions of the four above amenity areas.)

The remaining two amenity areas – Nature Walk and The Perch – are located along the public right-of-way and provide for pedestrian focus at the project edge. Nature Walk, located on the northern and western perimeters of the project site, would provide a landscaped buffer between Camino de la Reina and the project buildings. Within this landscaped area, Nature Walk would include interpretive signage, a decomposed granite path, and native plants. The Perch, located in the northwest corner of the project site, would provide a stepped entry to the main project area with a picnic area, and open lawn, and play elements, such as bocce ball. The Perch is intended to facilitate active social interaction and activate this corner of the project, which is adjacent to the direct connection leading to the street, Fashion Valley Mall, and Fashion Valley Transit Center.

The project would provide a total of 469 parking spaces. A six-story above-ground and one-story below-ground parking structure would be wrapped by the residential units and situated at the center of the project site providing a total of 404 parking spaces. The parking garage fronts on the I-8 West ramp from SR-163 South and provides a building buffer to vehicular noise generated by the proximity of the freeway. The parking structure would include rooftop solar panels. The balance of 65 parking spaces would be provided as surface parking. These surface parking spaces would be predominantly for commercial and retail patrons, as well as visitors of the project. As such, the surface parking would be located internal to the project along the project's eastern boundary, adjacent to retail and office uses as well as resident entryways. In addition to automobile parking, the project would provide 140 bicycle parking spaces and 34 motorcycle parking spaces.

3.2.2 Architectural Design

As shown in Figures 3-6a and 3-6b, *Project Elevations*, the Alexan Fashion Valley project would feature architectural elements that are intended to provide identifiable features, which would allow pedestrians and the motoring public to easily find their destinations. Architectural features such as

varied building materials, heights, and setbacks would provide relief to building façades and would create focal points around the project for both pedestrians and passing vehicles. The project's massing, colors, and materials have been selected to complement and blend with the adjacent development.

3.2.3 Vehicular and Pedestrian Access

Figure 3-7, *Alexan Fashion Valley Access Plan*, illustrates the project's pedestrian and vehicular access plan. Access to the project site currently occurs from three driveways off of Camino de la Reina. Primary vehicular access to the project would occur via a driveway located in the central portion of the western frontage along Camino de la Reina, in roughly the same location as the current driveway. The southwestern driveway would be retained in generally the same location as exists currently. The northern driveway would be shifted to the northeastern corner of the project site. A fire lane would be provided along the eastern boundary of the project site. Pedestrian movement would be accommodated throughout the project site, allowing pedestrians to easily move between the commercial and residential elements of the project via accentuated enhanced paving and signage. The project has been designed with a primary focus on the pedestrian and pedestrian access. The focus of pedestrian access and activity occurs at The Perch, a primary focal point for the project as described above, and the project's main access (The Oasis). As shown in Figure 3-5, pedestrian access would be provided along sidewalks on the north and west project site perimeters. Internal pedestrian access provides connections to buildings and the external sidewalks. Bicyclists would be able to travel through the site, along the eastern portion of the project site, and along Camino de la Reina.

3.2.4 Landscape Concept Plan

The proposed landscape plan (see Figure 3-8, *Landscape Planting Plan*) includes the use of indigenous and/or drought-tolerant plant material, whenever possible. No invasive or potentially invasive species would be utilized. Planting is intended to be a connecting device linking the various pieces of the project and design style. The landscape plan emphasizes a garden setting, where plant material would be used to help define spaces, encourage circulation paths, highlight entry points, and provide softness and scale to the architecture. Evergreen, deciduous, and flowering material are proposed throughout the project. Street trees are proposed to define vehicle/pedestrian spaces and to provide shade and scale to the street scene. A specimen street within The Nest would create a focal point for this amenity area and provide a statement accent at this site frontage from the street.

Landscaping throughout the Alexan Fashion Valley project site is characterized by a diverse array of trees, shrubs, and accent planting. Trees would be utilized to define spaces and create a sense of place. Street trees along Camino de la Reina would enhance the pedestrian realm, while screening trees along the eastern and southern boundary would help to screen out neighboring highways and provide shade and canopy for surface parking areas. Architectural accent trees and palms would be

located throughout the project and within amenity areas. The use of shrubs for screening and demarcation would be utilized, as well as groundcover, succulents, and vines.

3.2.5 Grading Plan

The project site is located in Special Flood Zone AE of the San Diego River based on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel No. 06073C1618G, dated May 16, 2012. The minimum finished floor elevations of buildings proposed for the project would be 2.0 feet above the maximum water surface elevation adjacent to the project site. The majority of the project site would be elevated with fill to achieve the 2.0 feet above maximum water surface elevation.

The *Grading Plan* for the project is shown in Figure 3-9, with cross sections shown in Figure 3-10, *Alexan Fashion Valley Grading Plan Cross Sections*. The entire project site has been previously graded and developed and would be re-graded to accommodate project development. Grading would involve 2,100 cubic yards of cut and 14,700 cubic yards of fill; approximately 12,600 cubic yards of material would be imported for the grading operation. Maximum depth of cut would be six feet and maximum cut slope height would be three feet. Maximum depth of fill would be 12.5 feet and the maximum height of fill slopes would be 12 feet. Approximately 740 feet of retaining walls are proposed for the project; the maximum height of walls would be approximately 6.5 feet and would occur along the east property line. These walls would be screened with landscape, such as Catalina Island cherry, an upright dense screening hedge, and white alder tree, a deciduous shade tree.

The project would be constructed in a single phase. Demolition would occur over approximately two months and grading and construction would occur over an approximate 28-month period.

3.3 Discretionary Actions

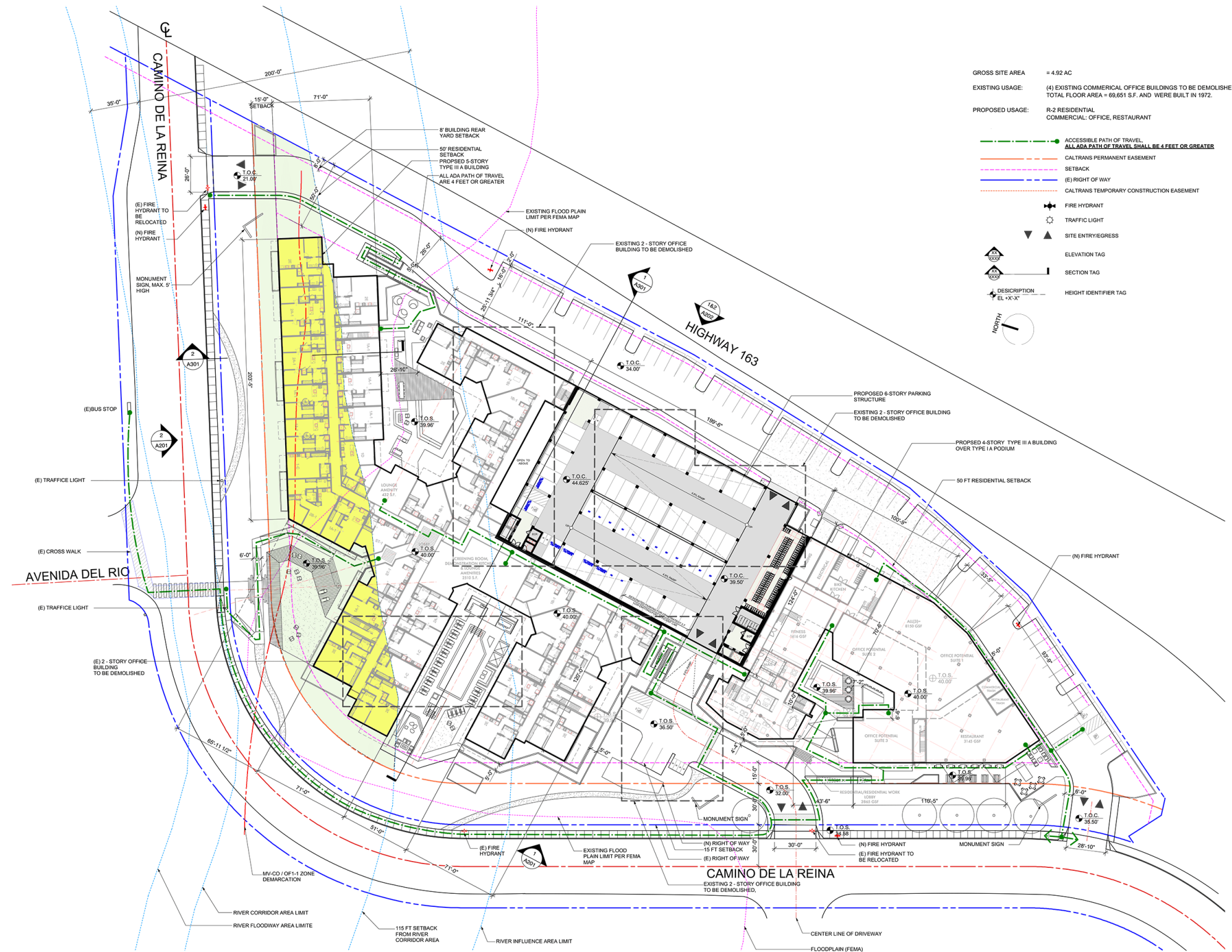
This EIR is intended to provide environmental documentation pursuant to CEQA to evaluate the potential environmental effects associated with the proposed project. As such, it covers all discretionary permits proposed as part of the project. The following discretionary actions would be considered by the City of San Diego Planning Commission:

Site Development Permit – A Mission Valley Development Permit is required, in the form of a Site Development Permit (SDP). In accordance with San Diego Municipal Code Section 1514.0201(d)(A), this permit would allow for the development of the Alexan Fashion Valley project, which would create a mix of residential, commercial, and retail uses within central Mission Valley, where the proposed uses would exceed the Threshold 1 ADT allocation of the Mission Valley Planned District Ordinance.

Planned Development Permit – A Planned Development Permit is required for the proposed development in order to implement the Multiple Use Option in the Mission Valley Community Plan.

3.0 PROJECT DESCRIPTION

The project is located in the Mission Valley Community Plan area and is governed by the Mission Valley PDO. The Mission Valley PDO identifies the zone for the project site as MV-CO. The project is proposing a Multiple Use Development in accordance with the Mission Valley Community Plan, which would allow development of the project site as a mixed-use project in the MV-CO zone.



**Figure 3-1. Alexan Fashion Valley
Site Plan**

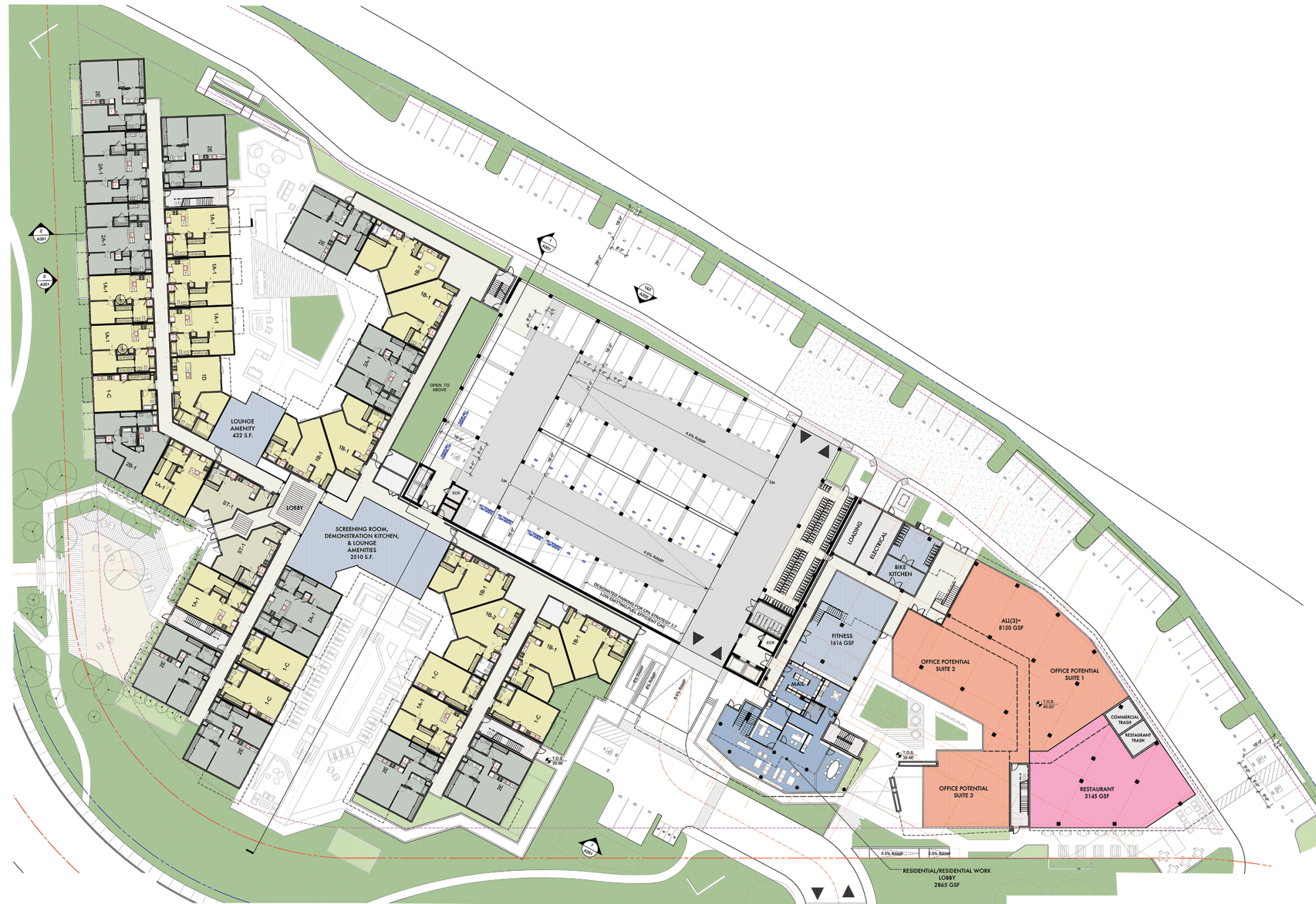
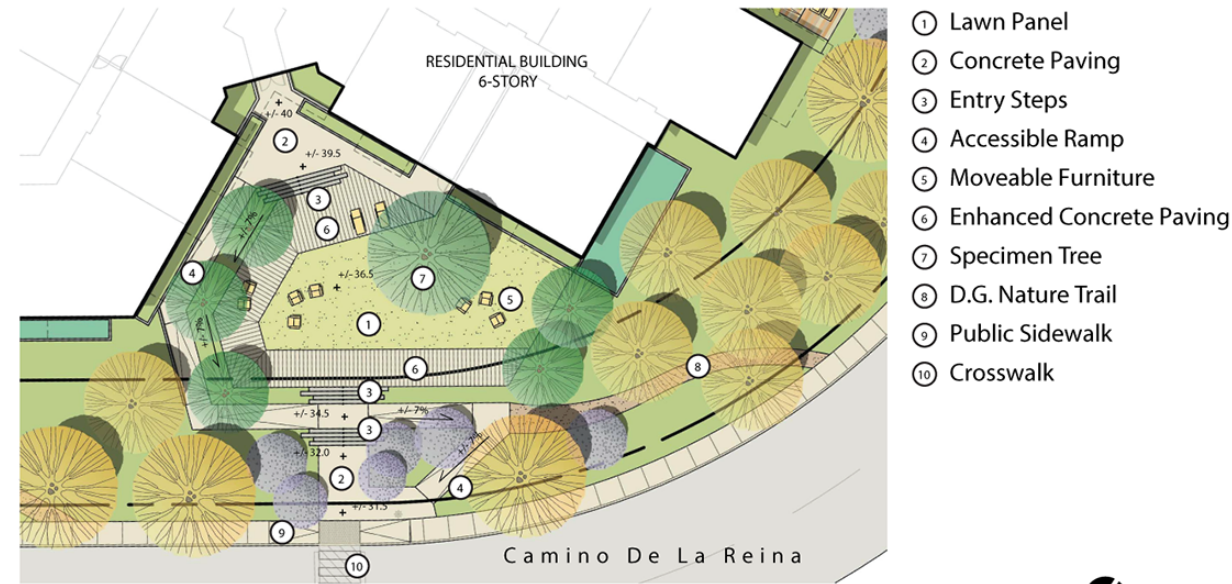




Figure 3-3. Alexan Fashion Valley Level 2 Plan

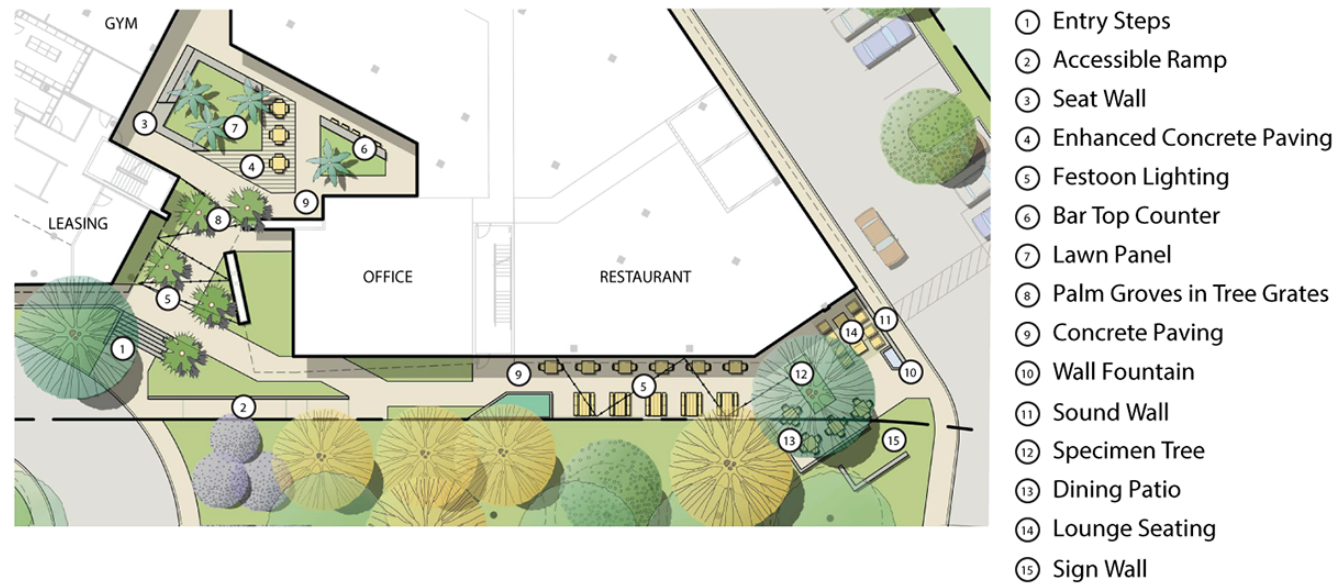


**Figure 3-4. Alexan Fashion Valley
Amenity Areas**



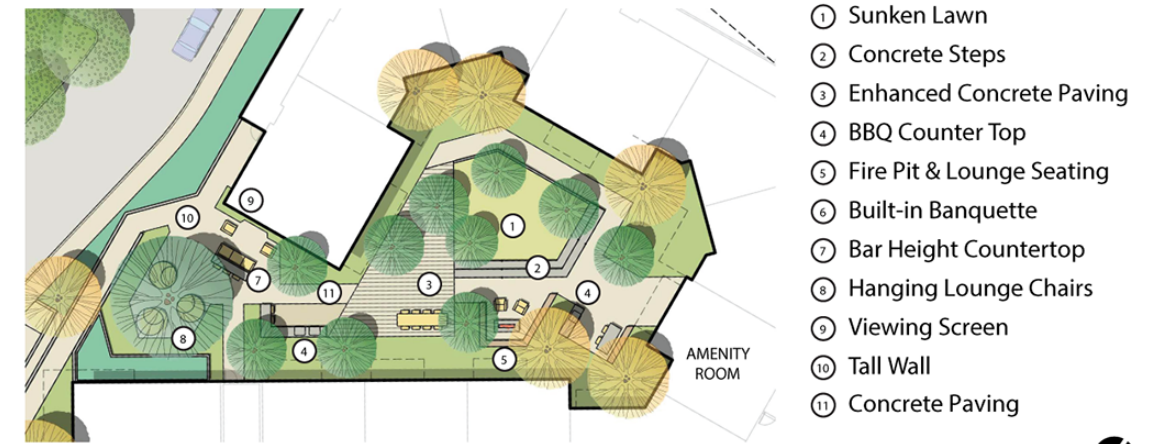
C. THE PERCH

Scale: 1/16"=1'0"



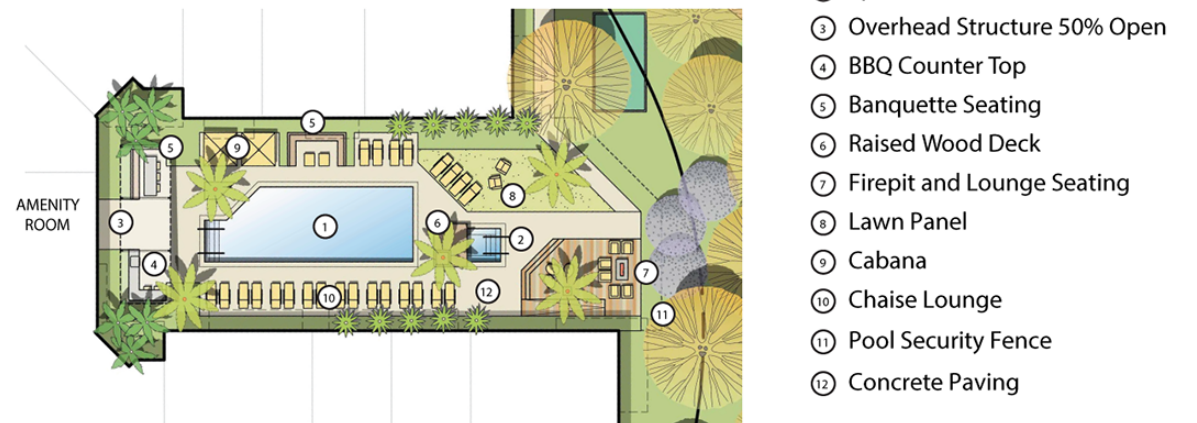
D. THE OASIS & NEST

Scale: 1/16"=1'0"



A. THE MEADOW

Scale: 1/16"=1'0"



B. THE POOL

Scale: 1/16"=1'0"

Figure 3-5. Amenity Area Enlargement Plans



Figure 3-6a. Project Elevations - West and Northwest Elevations



Figure 3-6b. Project Elevations – East Elevations

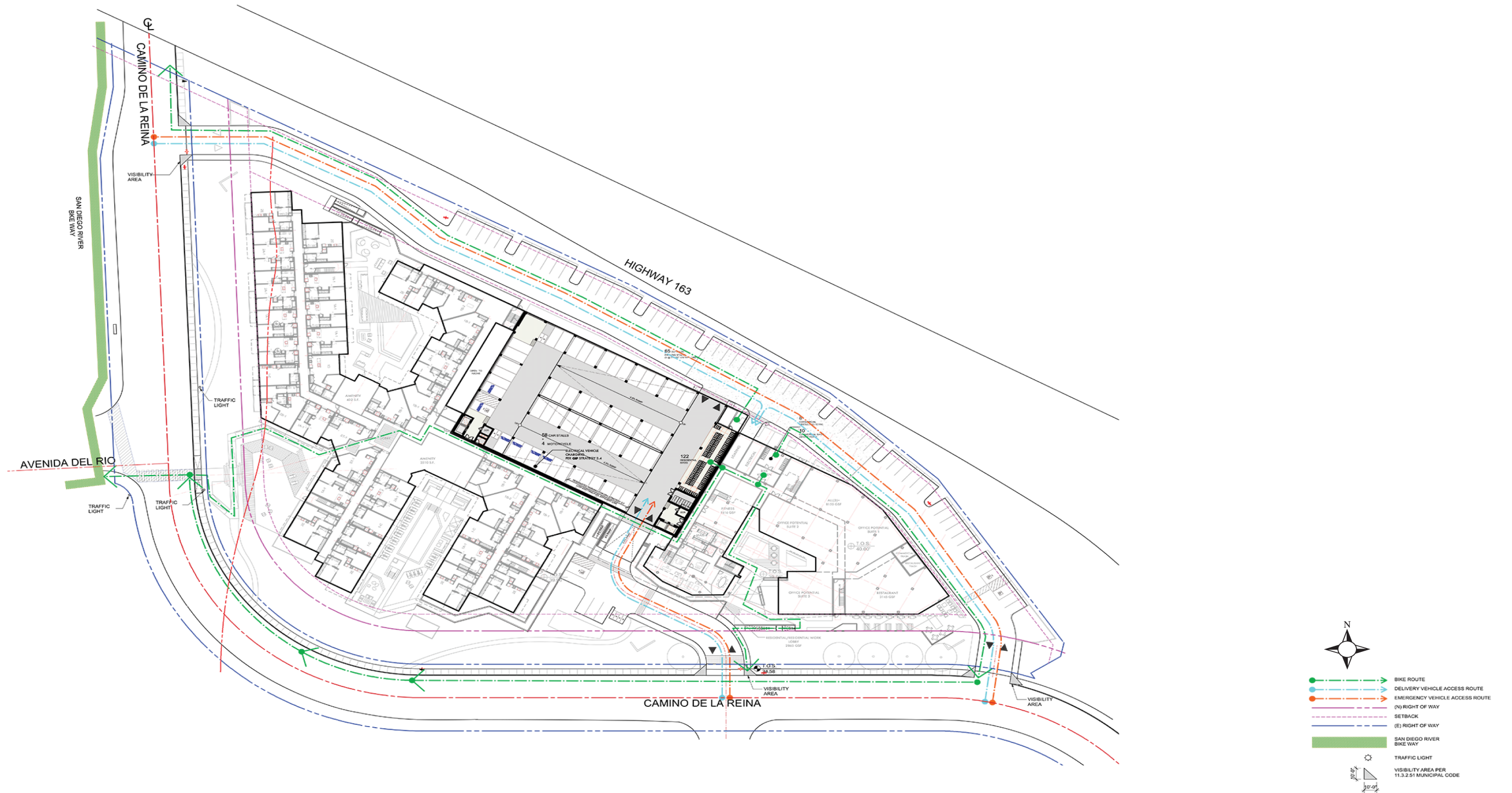


Figure 3-7. Alexan Fashion Valley Access Plan



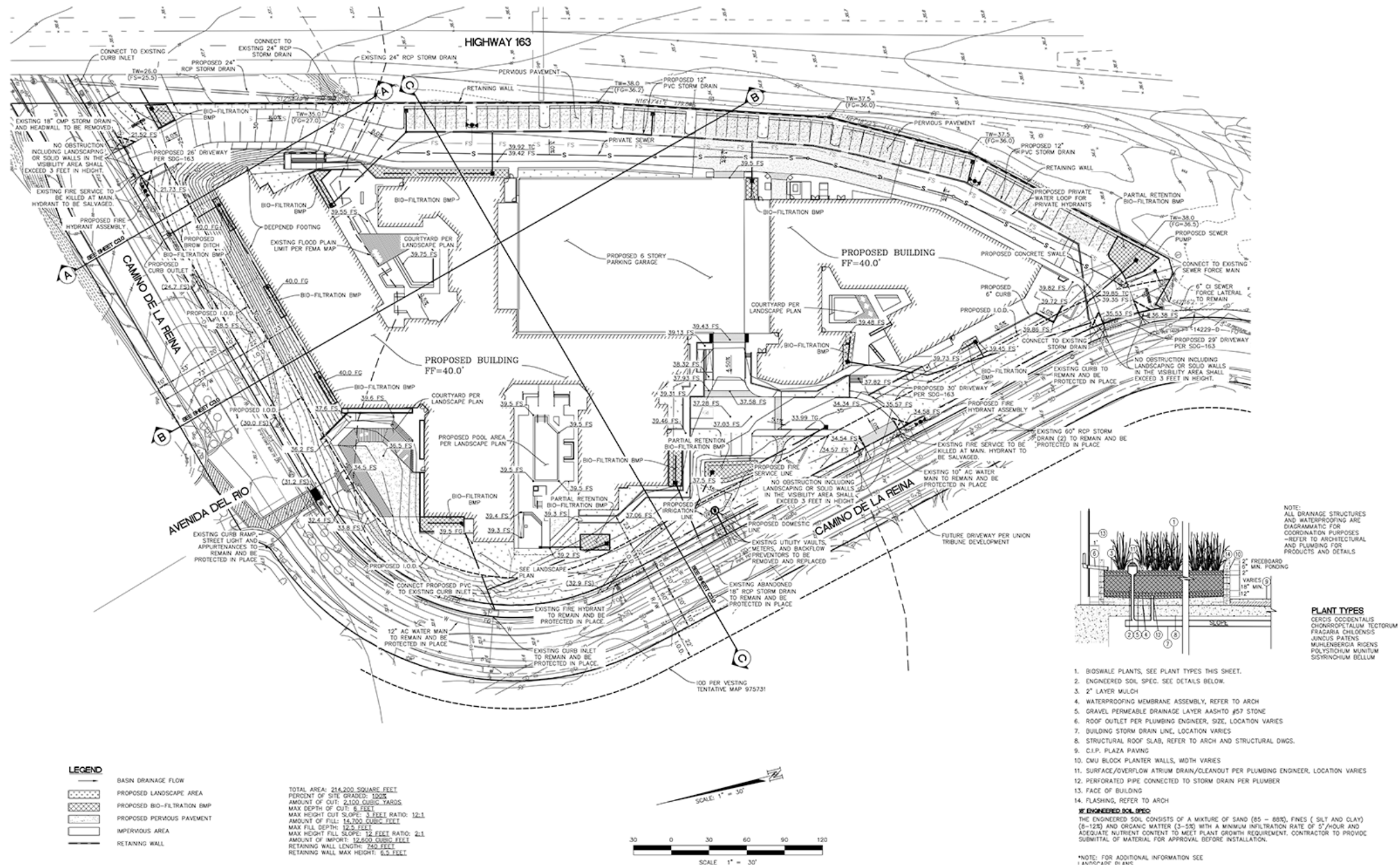


Figure 3-9. Alexan Fashion Valley Grading Plan

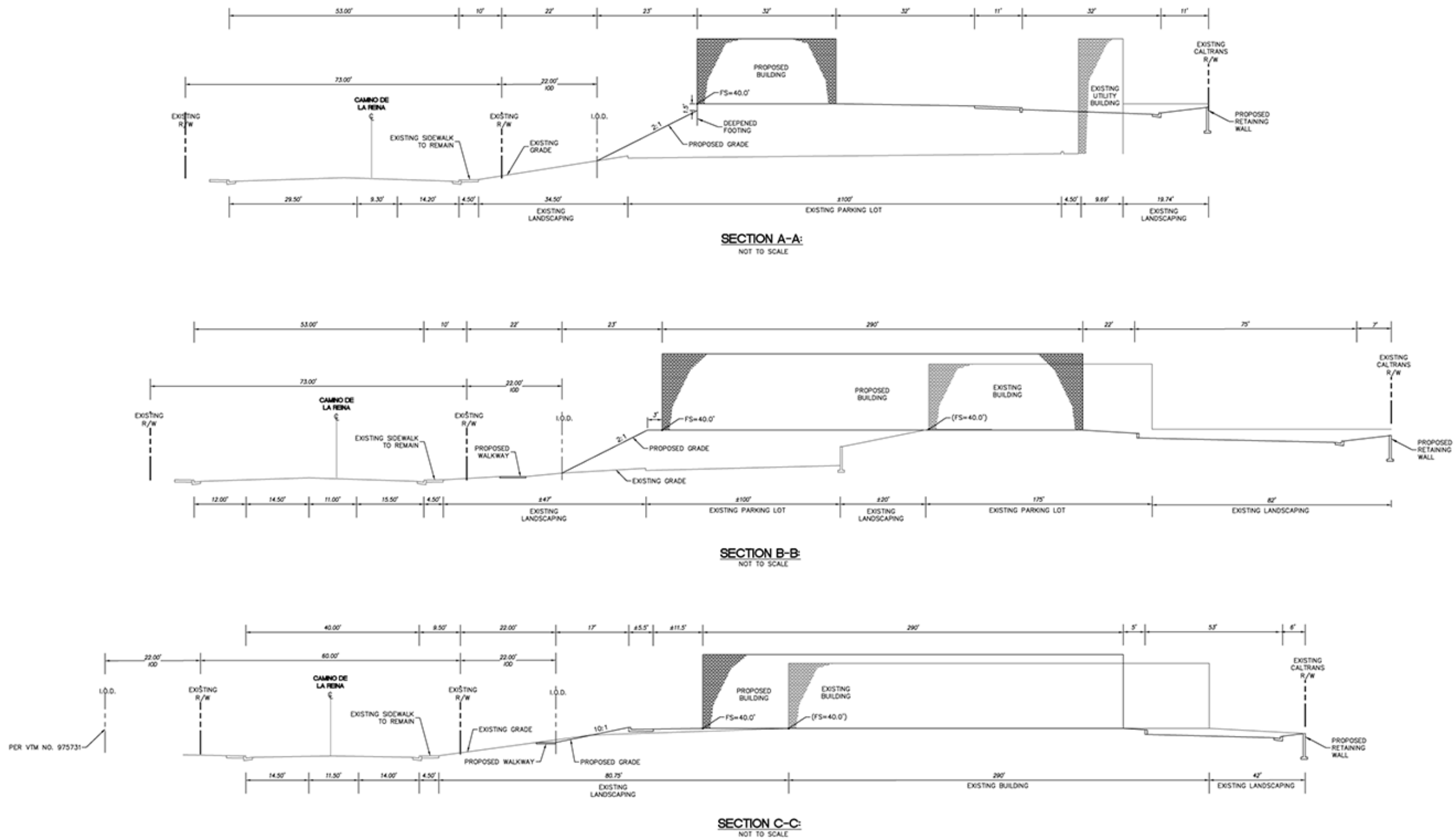


Figure 3-10. Alexan Fashion Valley Grading Plan Cross Section

4.0 HISTORY OF PROJECT CHANGES

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

During review of the project, the project submittal was revised to respond to comments raised by City staff associated with proposed uses, site design and architecture. Specifically:

- The project was revised to incorporate a greater amount of office space.
- Residential units specifically designed to provide opportunities and amenities that support home businesses were added to increase the mixed-use aspect of the project and to fulfill the need for this type of residential/work space in the community.
- In order to accentuate the importance of pedestrian connectivity and access, a design element was added to the project that provides a focal point in the form of a raised pedestrian plaza and gathering space at the central entrance to the project.
- The Site Plan was revised to reduce the number of residential units facing SR-163 freeway.
- The architecture along the SR-163 freeway was modified to break up façade and create movement.
- An expanded pedestrian realm was added along Camino de la Reina to include walkways through landscape areas directly accessing project entrances.
- Balconies were removed from residential units along SR-163, where noise levels exceed City standards. The project would provide useable and common open space elsewhere on the project site in excess of City requirements.

5.0 ENVIRONMENTAL ANALYSIS

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

- *Land Use*
- *Transportation/Traffic Circulation/Parking*
- *Visual Effects/Neighborhood Character*
- *Air Quality*
- *Global Climate Change*
- *Energy*
- *Noise*
- *Geologic Conditions*
- *Paleontological Resources*
- *Historical Resources*
- *Hydrology*
- *Water Quality*
- *Public Services and Facilities*
- *Public Utilities*
- *Health and Safety*
- *Tribal Cultural Resources*

5.1 Land Use

As stated in Section 2.0, *Environmental Setting*, development on the project site is governed by the City's General Plan, the City's CAP, the Mission Valley Community Plan, and the City's Land Development Code (including the Mission Valley Planned District Ordinance). Additionally, the project site is influenced by the San Diego International Airport ALUCP and Montgomery Field ALUCP and is within the City's Multiple Species Conservation Program (MSCP) area and the San Diego River Park Master Plan (SDRPMP) River Influence area.

This section addresses the consistency of the project with the development regulations of the Land Development Code and with the goals and policies contained in the City of San Diego General Plan, the City of San Diego CAP, Mission Valley Community Plan, the Montgomery Field ALUCP, the San Diego International Airport ALUCP, the MSCP, and the SDRPMP. The determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in physical changes to the environment that could cause secondary environmental impacts considered significant under CEQA. (The compatibility of the proposed project with surrounding land uses and community character is addressed in Section 5.3, *Visual Quality/Neighborhood Character*.)

5.1.1 Existing Conditions

RELEVANT PLANS AND POLICIES

The planning context of the *Environmental Setting*, Section 2.0 of this EIR, describes the land use plans and development regulations that apply to the development of the project. The following provides a brief recount or expansion of the planning context's discussion of selected plans and development regulations, including the City of San Diego General Plan, Mission Valley Community Plan, MSCP Subarea Plan, the SDRPMP, the Montgomery Field and San Diego International Airport ALUCPs, and pertinent Land Development Code regulations. A discussion of the project's compatibility with these plans is provided in Section 5.1.2, *Impact Analysis*.

CITY OF SAN DIEGO GENERAL PLAN

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

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

Balanced Communities and Equitable Development

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

City of Villages Strategy

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

- Mixed-use villages located throughout the City and connected by high quality transit.
- *LU-A.7.b.* Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services.

The City of San Diego has determined the "village propensity" for all areas within City jurisdiction. Village propensity is determined by analyzing an array of factors. The factors considered when

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

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

Walkable Communities

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

Bicycling

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

Parking Management

- Increased land use efficiencies in the provision of parking.

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

General Urban Design

- A pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social intersection, and that respects desirable community character and context.
- A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact.
- *UD-A.4.* Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.
- *UD-A.5.* Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.
- *UD-A.5.b.* Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials in proximity to commercial areas and residential neighborhoods that have a well established, distinctive character.
- *UD-A.5.c.* Provide architectural features that establish and define a building's appeal and enhance the neighborhood character.
- *UD-A.5.d.* Encourage the use of materials and finishes that reinforce a sense of quality and permanence.
- *UD-A.5.e.* Provide architectural interest to discourage the appearance of blank walls for development. This would include not only building walls, but fencing bordering the pedestrian network, where some form of architectural variation should be provided to add interest to the streetscape and enhance the pedestrian experience. For example, walls could protrude, recess, or change in color, height or texture to provide visual interest.
- *UD-A.5.f.* Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs and recessed doorways are used to provide visual interest at the pedestrian level.
- *UD-A.5.g.* Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they will be visible from a public right-of-way or accessible public place or street.
- *UD-A.5.i.* Maximize natural ventilation, sunlight, and views.

- *UD-A.5.j.* Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.
- *UD-A.6.* Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.
 - *UD-A.6.a.* Locate buildings on the site so that they reinforce street frontages.
 - *UD-A.6.c.* Ensure that building entries are prominent, visible, and well-located.
 - *UD-A.6.d.* Maintain existing setback patterns, except where community plans call for a change to the existing pattern.
 - *UD-A.6.e.* Minimize the visual impact of garages, parking and parking portals to the pedestrian and street façades.
- *UD-A.8.* Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.
 - *UD-A.8.a.* Maximize the planting of new trees, street trees and other plants for their shading, air quality, and livability benefits.
 - *UD-A.8.b.* Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available.
 - *UD-A.8.c.* Use landscape to support storm water management goals for filtration, percolation and erosion control.
 - *UD-A.8.e.* Landscape materials and design should complement and build upon the existing character of the neighborhood.
 - *UD-A.8.h.* Shade paved areas, especially parking lots.
 - *UD-A.8.i.* Demarcate public, semi-public/private, and private spaces clearly through the use of landscape, walls, fences, gates, pavement treatment, signs, and other methods to denote boundaries and/or buffers.
 - *UD-A.8.j.* Use landscaped walkways to direct people to proper entrances and away from private areas.
- *UD-A.11.* Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking.
 - *UD-A.11.d.* Provide well-defined, dedicated pedestrian entrances.
 - *UD-A.11.f.* Pursue development of parking structures that are wrapped on their exterior with other uses to conceal the parking structure and create an active streetscape. Where ground floor commercial is proposed, provide a tall, largely transparent ground floor along pedestrian active streets.
- *UD-A.12.a.* Encourage placement of parking along the rear and sides of street-oriented buildings.
- *UD-A.13.* Provide lighting from a variety of sources at appropriate intensities and qualities for safety.
- *UD-A.17.* Incorporate Crime Prevention Through Environmental Design (CPTED) measures, as necessary, to reduce incidences of fear and crime, and design safer environments.

Distinctive Neighborhoods and Residential Design

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

Mixed-Use Villages and Commercial Areas

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

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

Commercial Land Use

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

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

Park and Recreation Guidelines

- *RE-D.6.* Provide safe and convenient linkages to, and within, park and recreation facilities and open space areas.
- *RE-D.6.a.* Provide pedestrian and bicycle paths between recreation facilities and residential development.

The *Conservation Element* of the General Plan contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. Sustainable development and climate change issues are also addressed through the policies of the Conservation Element.

Conservation Element policies relevant to the proposed project call for the following:

Climate Change & Sustainable Development

- *CE-A.5.* Employ sustainable or "green" building techniques for the construction and operation of buildings.
- *CE-A.9.* Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:
 - Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;
 - Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system;
 - Removing code obstacles to using recycled materials in buildings and for construction; and
 - Implementing effective economic incentives to recycle construction and demolition debris.
- *CE-A.10.* Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.
- *CE-A.10.a.* Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.
- *CE-A.10.b.* Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage of paper, glass, plastic, metals, yard waste and other materials as needed.
- *CE-A.11.* Implement sustainable landscape design and maintenance.

Sustainable Energy

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

The General Plan's *Noise Element* is intended to protect people living and working in the City of San Diego from excessive noise. The most prevalent noise source in the City is motor vehicle traffic. Goals and policies provided in the Noise Element guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people from an excessive noise environment. The Noise Element promotes the following goals and policies pertaining to noise relevant to the Alexan Fashion Valley project:

Noise and Land Use Compatibility

- *NE-A.4.* Require an acoustical study consistent with Acoustical Study Guidelines for proposed developments in areas where the existing or future noise level exceeds or would exceed the "compatible" noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines (Table NE-3 of the General Plan), so that noise mitigation measures can be included in the project design to meet the noise guidelines.

Motor Vehicle Noise

- Minimal excessive motor vehicle traffic noise on residential and other noise-sensitive land uses.
- *NE-B.1.* Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.
- *NE-B.3.* Require noise reducing site design, and/or traffic control measures for new development in areas of high noise to ensure that the mitigated levels meet acceptable decibel limits.

Commercial and Mixed-Use Activity Noise

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

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

- Minimal exposure of residential and other noise-sensitive land uses to excessive construction refuse vehicles, parking lot sweeper-related noise and public noise.
- *NE-G.1.* Implement limits on the hours of operation for non-emergency construction and refuse vehicle and parking lot sweeper activity in residential area and areas abutting residential areas.
- *NE-G.2.* Implement limits on excessive public noises that a person could reasonably consider disturbing and/or annoying in residential areas and areas abutting residential areas.

Typical Noise Attenuation Methods

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

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

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

The *Housing Element* serves as a policy guide to address the comprehensive housing needs of the City of San Diego. It is intended to be an integrated, internally consistent and compatible statement of policies for housing in the City. It is one of ten elements of the City of San Diego's General Plan and is mandated by the State of California Government Code. State law mandates that local governments outline the housing needs of their community, the barriers or constraints to providing that housing, and actions proposed to address these concerns over an eight-year period. The Housing Element is subject to detailed statutory requirements and mandatory review by the California Department of Housing and Community Development (HCD), acknowledging that the availability of housing is a matter of statewide importance and that cooperation between government and the private sector is critical to attainment of the State's housing goals. Housing

Element law requires local governments to adequately plan to meet their existing and projected housing needs, including their share of the regional housing need. The law recognizes that in order for the private sector to adequately address housing needs and demand, local governments must adopt land-use plans and regulatory schemes that provide opportunities for, and do not unduly constrain, housing development. In accordance with California Senate Bill 375 (SB 375), which seeks to reduce GHG emissions, the Housing Element is a key part of an integrated transportation and housing planning process coordinated through a SCS and RTP. SB 375 recognizes the importance of planning for housing and land use in creating sustainable communities where residents of all income levels have access to jobs, services, and housing using transit, or by walking and bicycling (see the Sustainable Communities Strategy chapter in the 2050 RTP for more detail regarding the SCS for the San Diego region). The Housing Element promotes the following goals, objectives, and policies relevant to the Alexan Fashion Valley project:

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

CITY OF SAN DIEGO CLIMATE ACTION PLAN

In December 2015, the City of San Diego adopted its CAP. The CAP includes a municipal operations and community-wide GHG emissions baseline calculation from 2010 and sets a target to achieve a 15 percent reduction from the baseline by 2020, as required by California Assembly Bill 32. The CAP sets forth common-sense strategies to achieve attainable greenhouse gas reduction targets and outlines the actions that City will undertake to achieve its proportional share of State GHG emission reductions.

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

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

MISSION VALLEY COMMUNITY PLAN

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

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

The *Land Use Element* addresses land use within Mission Valley. Mission Valley's major land use components are commercial, residential, and industrial. Integrated commercial and residential mixed use developments also comprise a major component of Mission Valley's land use fabric. The following objectives, proposals, and development guidelines are applicable to the Alexan Fashion Valley project:

Residential

- **Objective.** Provide a variety of housing types and densities within the community.
- **Objective.** Encourage development which combines and integrates residential uses with commercial and service uses.
- **Proposal.** Provide amenities for residents such as recreation, shopping, employment and cultural opportunities within or adjacent to residential development.
- **Development Guideline.** Provide amenities intended primarily for use by residents.

- **Development Guideline.** Encourage a wide variety of housing types and styles. Although detached single-family dwellings are probably not feasible, there are still many options available.
- **Development Guideline.** Encourage close, easy access between residences and daily shopping facilities.

Commercial

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

Multiple Use Development Option

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

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

Public Transit

- **Objective.** Provide mitigation for traffic generation impacts through the provision and/or financing of public transportation facilities on a project-by-project basis.

Parking and Goods Delivery

- **Objective.** Provide adequate off-street parking for all new development in Mission Valley.
- **Proposal.** Discourage on-street curbside parking.
- **Proposal.** Minimize conflicts between driveways and traffic flow.
- **Proposal.** Provide adequate, well-designed off-street parking facilities.

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

Pedestrian Circulation

- **Objective.** Improve the visual quality as well as the physical efficiency of the existing and future pedestrian circulation system.
- **Proposal.** Provide adequate light in public areas.
- **Development Guideline.** Urban plazas and project recreational areas for the commercial, residential, hotel, and office development should have direct links to both the river and the public streets parallel to the river, re: Friars Road and Camino de la Reina.
- **Development Guideline.** Landscaped pedestrian sidewalks should be provided along all public streets to encourage pedestrian activity and expedite pedestrian access. Trees should be located adjacent to the curb to provide pedestrian scale and separation from vehicular activity without reducing normal sidewalk area. Tall, canopied trees are preferable to other trees.
- **Development Guideline.** Projects should front on the public street and provide identifiable pedestrian access from the street into the project, even in areas where parking lots are located between the street and the buildings.
- **Development Guideline.** Handicapped access must be provided to all areas of pedestrian activity, parking areas, buildings, pedestrian linkages, and the community-wide pedestrian system.

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

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

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

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

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

- **Objective:** Provide new development and redevelopment which integrates various land uses into coordinated multiuse projects.
- **Proposal:** Include a variety of revenue-producing uses in each large-scale multi-use project.
- **Proposal:** Ensure functional and physical integration of the various uses within the multi-use project and between adjacent uses or projects.
- **Development Guideline:** Multi-use development projects should include all of the following design elements: (a) Separate vehicular access and delivery loading zones. (b) People-oriented spaces. (c) Compatibility with adjacent development. (d) Uninterrupted pedestrian connections.
- **Development Guideline:** Encourage activity on a 24-hour basis within a development project by including one or more of the following types of uses in addition to office and retail: (a) Restaurants, (b) Theatres, (c) Hotels, (d) Residences.

- **Development Guideline:** Multi-use development projects should be processed and evaluated through the use of PCD permits and/or Specific Plans.
- **Characterization:** Public transit opportunities and commitments and permanent pedestrian linkages to public transit systems.
- **Characterization:** Interconnection of project components through an elaborate pedestrian circulation network (e.g., subterranean concourses, walkways and plazas at grade and aerial bridges between buildings).
- **Characterization:** Multi-use projects may also include separate structures on separate parcels of land providing that the creation of parcels and designation of uses is the result of a plan approved for the entire designated project and it meets the basic criteria for a multi-use project.
- **Policy:** Provide a landscaping plan to tie the various uses together.
- **Policy:** Provide careful positioning of key project components around centrally located focal points (e.g., a shopping gallery or hotel containing a large central court).

ZONING

Zoning for property located in the City of San Diego is governed by the City's Land Development Code. The project site is governed by the Mission Valley Planned District Ordinance, which appears as Chapter 15, Article 14, in the City's Land Development Code. As presented in Section 2.0, *Environmental Setting*, and shown on Figure 2-7, *Existing Zoning*, the Alexan Fashion Valley project site is zoned MV-CO. The purpose of the commercial zones in Mission Valley is to "provide office, hotel, and retail commercial uses as defined in the Mission Valley Community Plan." The MV-CO zone is intended to provide for business and professional offices and certain allied services normally associated with such offices.

As discussed in Section 2.5.3, *Mission Valley Community Plan*, the proposed project would develop under the "Multiple Use Option" allowed in the Community Plan. A "Multiple Use Option" approach is intended to permit greater flexibility in project design than is possible through strict application of conventional zoning regulations. It permits developers to combine land uses in such a way that community and individual project "self-containment" can be achieved. "Self-containment" means that all support facilities and services associated with a project are located either within the project or within a short walking distance. Examples include banks, restaurants, health facilities and food markets. "Self-containment" is intended to reduce the number of intra-Valley automobile trips, resulting in fuel conservation, decreased air pollution and less traffic. Developments within the MV-CO zone may employ the Multiple Use Option when:

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

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

CITY OF SAN DIEGO MULTIPLE SPECIES CONSERVATION PROGRAM SUBAREA PLAN

The MSCP is a comprehensive plan that has been established to preserve a network of habitat and open space in the region. The MSCP identifies a Multi-Habitat Planning Area (MHPA) in which the permanent MSCP preserve will be assembled and managed for its biological resources. In accordance with the MSCP, the City has developed a Subarea Plan to implement the MSCP and habitat preserve within the City of San Diego. Within the MSCP, the project site is located within an urban habitat area. The Alexan Fashion Valley project site is within the City's MSCP Subarea, but is not located within or adjacent to the MHPA. The closest MHPA is mapped for the San Diego River, located on the north side of Camino de la Reina, is approximately 0.10 mile from the project site.

SAN DIEGO RIVER PARK MASTER PLAN

The San Diego River Park Master Plan is a policy document that provides recommendations and design guidelines for the land use decisions along the San Diego River. The vision of the River Park Master Plan is to “reclaim the valley as a common, synergy of water, wildlife and people.” The River Park Master Plan divides the San Diego River into six segments, or reaches, that are based on topographic characteristics and river conditions. The six reaches include the Estuary (Pacific Ocean to I-5), the Lower Valley (I-5 to I-15), the Confluence (I-15 to Friars Road Bridge), the Upper Valley (Friars Road Bridge to Mission Trails Regional Park), the Gorge (within Mission Trails Regional Park) and the Plateau (east of Mission Trails to the City of Santee). The proposed project site is located within the Lower Valley Reach area of the river.

Each of the six reaches has its own general and specific recommendations on the future development of the river valley. The Design Guidelines of the River Park Master Plan provides written and graphic information to support the Master Plan Vision, Principles, and Recommendations and is written for two distinct areas of the River Park area: the River Corridor Area and the River Influence Area. The River Corridor Area is defined as all areas within 35 feet of the 100-year floodway. The River Influence Area is defined as areas within 200 feet of the River Corridor Area. A portion of the project site falls within the River Influence Area. The recommendations describe general and specific strategies for addressing the ecological health of the river, facilitating human recreational use, as an amenity for economic development, and how development should be reoriented toward the river to create value and provide identity for the San Diego River Park.

AIRPORT LAND USE COMPATIBILITY PLANS

The basic function of ALUCPs (or Compatibility Plans) is to promote compatibility between airports and the land uses that surround them to the extent that these areas are not already devoted to

incompatible uses. With limited exception, California law requires preparation of a compatibility plan for each public-use and military airport in the state. Most counties have established an ALUC, as provided for by law, to prepare compatibility plans for the airports in that county and to review land use plans and development proposals, as well as certain airport development plans, for consistency with the compatibility plans. In San Diego County, the ALUC function rests with the San Diego County Regional Airport Authority (SDCRAA), as provided in Section 21670.3 of the California Public Utilities Code. The project site is within the Area of Influence for the Montgomery Field and San Diego International Airport ALUCPs.

The project site is within the Airport Influence Area, Review Area 2, for the Montgomery Field ALUCP. The project site is also located within the Federal Aviation Administration (FAA) Height Notification Boundary of Montgomery Field Airport. Within the boundary, Part 77, Subpart B requires that the FAA be notified of any proposed construction or alteration having a height greater than an imaginary surface extending 100 feet outward and one foot upward (slope of 100 to one) from the runway elevation. The project site is more than five miles from Montgomery Field and within Mission Valley, which sits below the mesa where Montgomery Field is located. Tallest structures would be approximately 103 feet in height. The project would not result in obstruction to airport operations from Montgomery Field. As such, the proposed project is not required to obtain a FAA Part 77 Notice of Determination letter. The project site is outside of all other Montgomery Field policy maps, which include Noise, Safety, Overflight, and Avigation Easement and Overflight Notification Area.

The project site is within the Airport Influence Area, Review Area 2, for the San Diego International Airport ALUCP. The project site is outside of the Noise Contour, Safety Zone, Overflight Area, ALUCP Impact Area, and Airport Approach Overlay Boundary policy maps. The project site is within the Airspace Protection Boundary, but outside of the FAA Part 77 Surfaces. As such, the proposed project is not required to obtain an FAA Part 77 Notice of Determination letter.

5.1.2 Impact Analysis

Thresholds of Significance

According to the City of San Diego's *Significance Determination Thresholds*, a significant impact to land use could occur if there is a/an:

- Inconsistency/conflict with the environmental goals, objectives, or guidelines of a Community Plan or General Plan;
- Inconsistency/conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts occur;
- Substantial incompatibility with an adopted plan;
- Incompatible uses as defined in an airport land use plan or inconsistency with an airport's Comprehensive Land Use Plan (CLUP) as adopted by the Airport Land Use Commission (ALUC);
- Inconsistency/conflict with adopted environmental plans for an area; and/or

- Significantly increase the base flood elevation for upstream properties, or construct in a Special Flood Hazard Area (SFHA) or floodplain/wetland buffer zone.

Note: Project impacts relative to floodplain and flood hazards are addressed in Section 5.11, *Hydrology*.

Issue 1

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

Issue 1 addresses the following thresholds of significance:

- Inconsistency/conflict with the environmental goals, objectives, or guidelines of a Community Plan or General Plan;
- Substantial incompatibility with an adopted plan;
- Incompatible uses as defined in an airport land use plan or inconsistency with an airport's Comprehensive Land Use Plan (CLUP) as adopted by the Airport Land Use Commission (ALUC);
- Inconsistency/conflict with adopted environmental plans for an area.

Impact Analysis

Project consistency with the San Diego International Airport and Montgomery Field ALUCPs is addressed in Section 5.15, *Health and Safety*. As is concluded in Section 5.15, the project is consistent with the applicable ALUCPs and no impacts would occur.

Relative to project consistency with an adopted environmental plan, the project site is not located within the MHPA. Therefore, no impacts would occur and no additional analysis is required.

CITY OF SAN DIEGO GENERAL PLAN

The City of San Diego General Plan identifies the project site as Commercial Employment, Retail, and Services. The project does not result in a land use conflict or need for a change in land use designation because the proposed uses are consistent with the Mission Valley Community Plan, which acts as the community-specific policy document for the General Plan.

Section 5.1.1, *Existing Conditions*, above, presents the relevant goals and policies of the City of San Diego General Plan for the project. Table 5.1-1, *General Plan Consistency Analysis*, includes the previously identified goals and policies and a discussion relative to the project's consistency with the respective goals and policies.

Table 5.1-1. General Plan Consistency Analysis

Land Use & Community Planning Element	
City of Villages Strategy	
Goal: Mixed-use villages located throughout the City and connected by high-quality transit.	Consistent – The proposed project integrates residential and a variety of retail uses within walking distance of the Fashion Valley Transit Center providing light rail and bus service connecting to all regions of the County.
Policy LU-A.7.b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services.	
Policy LU-A.10. Design infill projects along transit corridors to enhance or maintain a “Main Street” character through attention to site and building design, land use mix, housing opportunities, and streetscape improvements.	
	Consistent – The proposed project is located along Camino de la Reina in a designated gateway to the community. Although the street as it currently exists has no Main Street character, redevelopment approved for the Union Tribune building, in conjunction with the proposed project, would address Camino de la Reina on both sides, providing enhanced landscaping and sidewalk treatments that would create the Main Street feel in this area. Retail facing Camino de la Reina, as well as orienting the primary elevations of the project to Camino de la Reina, reinforce this Main Street character.
Balanced Communities and Equitable Development	
Goal: Ensure diverse and balanced neighborhoods and communities with housing available for households of all income levels.	Consistent – The project contributes to making Mission Valley a balanced community by providing for a variety of housing types and sizes within the same development. Additionally, the project supports telecommuting and home businesses by providing 48 home business focused residential units with access to over 3,500 square feet of dedicated business center space for these units, including conference rooms and private cubicles. Being a mixed-use project, the project provides for housing, employment, and retail amenities proximate to similar uses and transit. The project site is located within a high village propensity area and provides uses to add to the village character of this portion of Mission Valley. The Fashion Valley Transit Center is within short walking distance from the site.
Policy LU-H.1.d. Ensure that neighborhood development and redevelopment addresses the needs of older people, particularly those disadvantaged by age, disability, or poverty.	
Policy LU-H.4. Strive for balanced commercial development.	
Policy LU-H.4.c. Ensure that commercial districts are balanced and do not exclude the retail, employment and service needs of local residents.	
Policy LU-H.4.d. Encourage local employment within new developments and provide entrepreneurial opportunities for local residents.	
Policy LU-H.6. Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.	
Policy LU-H.7. Provide a variety of different types of land uses within a community in order to offer opportunities for a diverse mix of uses and to help create a balance of land uses within a community.	
Mobility Element	
Walkable Communities	
Goal: A city where walking is a viable travel choice, particularly for trips of less than one-half mile.	Consistent – The project promotes walkability by providing for a variety of uses on-site with clear pedestrian pathways. The project proposes a

<p>Goal: A safe and comfortable pedestrian environment.</p> <p>Goal: A complete, functional, and interconnected pedestrian network that is accessible to pedestrians of all abilities.</p> <p>Goal: Greater walkability achieved through pedestrian-friendly street, site and building design.</p> <p><i>Policy ME-A.2.d.</i> Implement Crime Prevention Through Environmental Design (CPTED) measures to reduce the threat and incidence of crime in the pedestrian environment.</p> <p><i>Policy ME-A.2.f.</i> Provide adequate levels of lighting for pedestrian safety and comfort.</p> <p><i>Policy ME-A.6.a.3.</i> Design grading plans to provide convenient and accessible pedestrian connections from new development to adjacent uses and streets.</p> <p><i>Policy ME-A.7.a.</i> Enhance streets and other public rights-of-way with amenities such as street trees, benches, plazas, public art or other measures including, but not limited to those described in the Pedestrian Improvement Toolbox, Table ME-1.</p> <p><i>Policy ME-A.7.b.</i> Design site plans and structures with pedestrian-oriented features.</p> <p><i>Policy ME-A.7.c.</i> Encourage the use of non-contiguous sidewalk design where appropriate to help separate pedestrians from auto traffic. In some areas, contiguous sidewalks with trees planted in grates adjacent to the street may be a preferable design.</p> <p><i>Policy ME-A.8.</i> Encourage a mix of uses in villages, commercial centers, transit corridors, employment centers and other areas as identified in community plans so that it is possible for a greater number of short trips to be made by walking.</p>	<p>contiguous sidewalk along Camino de la Reina. Additionally, the project includes a non-contiguous decomposed granite pathway in the north and western portions of the site, which meanders in the space between the contiguous sidewalk and built area of the project site, providing spatial and topographic separation between pedestrians and automobiles. By providing both options of a contiguous sidewalk and non-contiguous pathway, the project meets the intent of Policy ME-A.7.c, which encourages the “use of non-contiguous sidewalk design to help separate pedestrians from auto traffic.”</p> <p>The project would provide lighting in accordance with Municipal Code regulations to ensure pedestrian safety in the evening hours. Additionally, the project would promote the use of non-motorized transportation by providing bike racks and bicycle storage with combined capacity for 140 bicycles. The provision of a central wrapped parking garage further provides for land use efficiencies. The project proposes a Nature Walk amenity area of pedestrian pathways located on the northern and western perimeter of the project site and would provide a landscaped buffer between Camino de la Reina and the project buildings. Full pedestrian circulation is provided along the entire perimeter of the site and enhanced pedestrian connections are included internally throughout the site connecting the residential, open space, office, industrial, and retail amenity uses.</p> <p>Pedestrian connectivity to the Fashion Valley Transit Center is provided via the shared pedestrian/bicycle path along the San Diego River traversing to the west along the Town and Country property, and ultimately crossing the San Diego River to connect to the transit center. The project also proposes an irrevocable offer of dedication (IOD) and deferred improvement agreement (DIA) for the widening of Camino De La Reina along the project frontage. In addition, the project would be responsible for restriping the project frontage following widening (to account for appropriate transitions) of Camino De La Reina to 3-lane Collector standards between Driveway 1 and Hotel Circle.</p>
<p>Bicycling</p> <p><i>Policy ME-F.4.</i> Provide safe, convenient, and adequate short and long term bicycle parking facilities and other bicycle amenities for employment, retail, multi-family housing, schools, colleges, and transit facility uses.</p> <p>b. Provide bicycle facilities and amenities to</p>	<p>Consistent – Pedestrian/bicyclist connectivity to the Fashion Valley Transit Center is provided via the shared pedestrian/bicycle path along the San Diego River accessed by crossing Camino de la Reina. Bicycle racks will be provided at the project site for resident</p>

help reduce the number of vehicle trips.	and/or retail employee use in excess of City requirements
Parking Management	
Goal: Increased land use efficiencies in the provision of parking	Consistent- The project proposes a central wrapped parking garage that further provides for land use efficiencies.
Urban Design Element	
General Urban Design Goal	
<p>Goal: A pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social intersection, and that respects desirable community character and context.</p> <p>Goal: A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact.</p> <p><i>Policy UD-A.4.</i> Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.</p> <p><i>Policy UD-A.5.</i> Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.</p> <p><i>Policy UD-A.5.b.</i> Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials in proximity to commercial areas and residential neighborhoods that have a well established, distinctive character.</p> <p><i>Policy UD-A.5.c.</i> Provide architectural features that establish and define a building's appeal and enhance the neighborhood character.</p> <p><i>Policy UD-A.5.d.</i> Encourage the use of materials and finishes that reinforce a sense of quality and permanence.</p> <p><i>Policy UD-A.5.e.</i> Provide architectural interest to discourage the appearance of blank walls for development. This would include not only building walls, but fencing bordering the pedestrian network, where some form of architectural variation should be provided to add interest to the streetscape and enhance the pedestrian experience. For example, walls could protrude, recess, or change in color, height or texture to provide visual interest.</p> <p><i>Policy UD-A.5.f.</i> Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs and recessed doorways are used to</p>	<p>Consistent – Project design is articulated 360 degrees, from varying building heights to recessed/protruding design elements to finish materials and color palette. The project proposes an extensive drought tolerant landscaping plan to establish a sense of character, increase canopy shade coverage, and contribute to wayfinding. The project would create a distinct character and would contribute to Crime Prevention through Environmental Design (CPTED) by providing for 24-hour use on the project site, locating windows looking out onto the street with street-level entries, and ensuring that adequate lighting is provided. The proposed project is located within walking distance to the Fashion Valley Transit Center</p>

provide visual interest at the pedestrian level.

Policy UD-A.5.g. Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they will be visible from a public right-of-way or accessible public place or street.

Policy UD-A.5.i. Maximize natural ventilation, sunlight, and views.

Policy UD-A.5.j. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.

Policy UD-A.6. Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.

Policy UD-A.6.a. Locate buildings on the site so that they reinforce street frontages.

Policy UD-A.6.c. Ensure that building entries are prominent, visible, and well-located.

Policy UD-A.6.d. Maintain existing setback patterns, except where community plans call for a change to the existing pattern.

Policy UD-A.6.e. Minimize the visual impact of garages, parking and parking portals to the pedestrian and street façades.

Policy UD-A.8. Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.

Policy UD-A.8.a. Maximize the planting of new trees, street trees and other plants for their shading, air quality, and livability benefits.

Policy UD-A.8.b. Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available.

Policy UD-A.8.c. Use landscape to support storm water management goals for filtration, percolation and erosion control.

Policy UD-A.8.e. Landscape materials and design should complement and build upon the existing

<p>character of the neighborhood.</p> <p><i>Policy UD-A.8.h.</i> Shade paved areas, especially parking lots.</p> <p><i>Policy UD-A.8.i.</i> Demarcate public, semi-public/private, and private spaces clearly through the use of landscape, walls, fences, gates, pavement treatment, signs, and other methods to denote boundaries and/or buffers.</p> <p><i>Policy UD-A.8.j.</i> Use landscaped walkways to direct people to proper entrances and away from private areas.</p> <p><i>Policy UD-A.11.</i> Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking.</p> <p><i>Policy UD-A.11.d.</i> Provide well-defined, dedicated pedestrian entrances.</p> <p><i>Policy UD-A.11.f.</i> Pursue development of parking structures that are wrapped on their exterior with other uses to conceal the parking structure and create an active streetscape. Where ground floor commercial is proposed, provide a tall, largely transparent ground floor along pedestrian active streets.</p> <p><i>Policy UD-A.12.a.</i> Encourage placement of parking along the rear and sides of street-oriented buildings.</p> <p><i>Policy UD-A.13.</i> Provide lighting from a variety of sources at appropriate intensities and qualities for safety.</p> <p><i>Policy UD-A.17.</i> Incorporate Crime Prevention Through Environmental Design (CPTED) measures, as necessary, to reduce incidences of fear and crime, and design safer environments.</p>	
Distinctive Neighborhoods and Residential Design	
<p>Goal: Infill housing, roadways and new construction that are sensitive to the character and quality of existing neighborhoods.</p> <p><i>Policy UD-B.1.a.</i> Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to existing development. For example, new development should not cast shadows</p>	<p>Consistent - Project design is articulated 360 degrees, from varying building heights to recessed/protruding design elements to finish materials and color palette. The project proposes an extensive landscaping plan to establish a sense of character and contribute to wayfinding. Residential units for the project would be provided in a variety of forms. Studio, one-bedroom, two-bedroom, and three-bedroom units would be provided. Additionally, the project introduces residential-work units designed to accommodate individuals who operate businesses from a home</p>

<p>or create wind tunnels that will significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development.</p> <p><i>Policy UD-B.2.a.</i> Incorporate a variety of unit types in multifamily projects.</p> <p><i>Policy UD-B.2.c.</i> Provide transitions of scale between higher-density development and lower-density neighborhoods.</p> <p><i>Policy UD-B.4.a.</i> Locate buildings on the site so that they reinforce street frontages.</p> <p><i>Policy UD-B.8.</i> Provide useable open space for play, recreation, and social or cultural activities in multifamily as well as single-family projects.</p>	<p>office. The project also offers six amenity areas for use by residents, employees, and visitors.</p>
Mixed-Use Villages and Commercial Areas	
<p><i>Policy UD-C.1.a.</i> Encourage both vertical (stacked) and horizontal (side-by-side) mixed-use development.</p> <p><i>Policy UD-C.4.b.</i> Design or redesign buildings to include pedestrian-friendly entrances, outdoor dining areas, plazas, transparent windows, public art, and a variety of other elements to encourage pedestrian activity and interest at the ground floor level.</p> <p><i>Policy UD-C.4.d.</i> Provide pathways that offer direct connections from the street to building entrances.</p> <p><i>Policy UD-C.7.</i> Enhance the public streetscape for greater walkability and neighborhood aesthetics.</p>	<p>Consistent - Being a mixed-use project, the project provides for housing, employment, and retail amenities proximate to similar uses and transit. The project promotes pedestrian activity by providing for a variety of uses on-site with clear pedestrian pathways. The project has been designed with a primary focus on the pedestrian and pedestrian access. The focus of pedestrian access and activity occurs at The Perch, a primary focal point for the project, and the project's main access point (The Oasis). Internal pedestrian access provides connections to building and the external sidewalks. The project includes outdoor amenity areas such as the Oasis, a plaza-like setting with a wood deck and the Nest, an outdoor dining patio.</p>
Economic Prosperity Element	
Commercial Land Use	
<p><i>Policy EP-B.8.</i> Retain the City's existing neighborhood commercial activities and develop new commercial activities within walking distance of residential areas, unless proven infeasible.</p>	<p>Consistent - The project would develop new commercial activities within walking distance of residential areas, including both proposed and existing residential areas.</p>
Public Facilities, Services, and Safety Element	
<p>Goal: Protection of beneficial water resources through pollution prevention and interception efforts.</p>	<p>Consistent - As discussed in EIR Section 5.11 (Hydrology) and 5.12 (Water Quality), water resources (i.e., the San Diego River) are located in the project area. Compliance with the General Construction, Municipal Stormwater Permit and the City of San Diego Stormwater Standards Manual will protect beneficial uses through pollution prevention and interception.</p>
<p>Goal: A storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable.</p>	<p>Consistent - As discussed in EIR Section 5.11 (Hydrology) and 5.12 (Water Quality), water resources are located within the project area. Compliance with the City of San Diego Stormwater Standards Manual,</p>

	which includes preparation of a SWPPP, implementation of construction BMPs, post-construction Standard Development Project LID/Design, Priority Development Project BMPs and Treatment Control BMPs will reduce run-off rates and durations and avoid runoff of urban pollutants to the maximum extent practicable.
Goal: Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions.	Consistent - As discussed in EIR Section 5.8 (Geology), the proposed project would comply with all City structural engineering standards, and the project site is not located within a seismic risk area.
Goal: Development that avoids inappropriate land uses in identified seismic risk areas.	
Recreation Element	
<p><i>Policy RE-A.8.</i> Provide population-based parks at a minimum ratio of 2.8 useable acres per 1,000 residents (see also Table RE-2, Parks Guidelines).</p> <ol style="list-style-type: none"> All park types within the Population-based Park Category could satisfy population-based park requirements (see also Table RE-2, Parks Guidelines). The allowable amount of useable acres exceeding two percent grade at any given park site would be determined on a case-by-case basis by the City. Include military family housing populations when calculating population-based park requirements. 	<p>Consistent - The project proposes 284 residential units and would be subject to the City's population-based park requirements. Based on SANDAG's current vacancy rate for multi-family residential units in the Mission Valley Community (6.3 percent) and a density factor of 1.5 persons per household, the project could generate approximately 399 residents. The recreation element of the City's General Plan recommends 2.8 acres per 1,000 population. Therefore, the project would require 1.12 acres of usable population-based park land to serve the project's anticipated population. The project would meet its population-based park requirements through the payment of Development Impact Fees.</p> <p>Additionally, the project would provide six amenity areas totaling 30,470 square feet and a 2,188-square-foot fitness center. Two of these amenity areas would be private and would serve the residents of the project: The Meadow and The Pool. The Oasis and The Nest are intended to serve both project residents and employees, as well as patrons of the project's retail offerings. The remaining two amenity areas, Nature Walk and The Perch, are located along the public right-of-way and provide for pedestrian focus at the project edge.</p>
<p><i>Policy RE.A.10.</i> Encourage private development to include recreation facilities, such as children's play areas, rooftop parks and courts, useable public plazas, and mini-parks to supplement population-based parks.</p>	<p>Consistent - The project would provide six amenity areas. Two of these amenity areas would be private and would serve the residents of the project: The Meadow and The Pool. The Oasis and The Nest are intended to serve both project residents and employees, as well as patrons of the project's retail offerings. The remaining two amenity areas, Nature Walk and The Perch, are located along the public right-of-way and provide for pedestrian focus at the project edge. In total, the project proposes 19,408 square feet of private open space in the form of private balconies and 30,470 square feet of common open space in the form of on-site recreational amenities, such as the</p>

	fitness center, pool area, and other spaces.
<p><i>Policy RE-D.6.</i> Provide safe and convenient linkages to, and within, park and recreation facilities and open space areas.</p> <p><i>Policy RE-D.6.a.</i> Provide pedestrian and bicycle paths between recreation facilities and residential development.</p>	<p>Consistent – The project does not propose the development of new public recreational facilities. Instead, the project provides for both private recreation facilities for residents, as well as a plaza accessible to the public. Relative to the provision of population-based parks, the project would pay the park portion of the Mission Valley Development Impact Fee (DIF), which would contribute to the Mission Valley Financing Plan for development of future population-based parks in Mission Valley.</p>
Conservation Element	
Climate Change and Sustainable Development	
<p><i>Policy CE-A.5.</i> Employ sustainable or “green” building techniques for the construction and operation of buildings.</p> <p><i>Policy CE-A.9.</i> Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:</p> <ul style="list-style-type: none"> • Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases; • Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system; • Removing code obstacles to using recycled materials in buildings and for construction; and • Implementing effective economic incentives to recycle construction and demolition debris. <p><i>Policy CE-A.10.</i> Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.</p> <p><i>Policy CE-A.10.a.</i> Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.</p> <p><i>Policy CE-A.10.b.</i> Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage of paper, glass, plastic, metals, yard waste and other materials as needed.</p> <p><i>Policy CE-A.11.</i> Implement sustainable landscape design and maintenance.</p>	<p>Consistent - The project provides for a number of sustainable design features, to include low water usage appliances, drought tolerant landscaping, solar, and promotion of recycling on-site.</p> <p>Photovoltaic infrastructure is incorporated into the rooftop shade structures on the upper level of the parking garage.</p> <p>Relative to demolition and construction waste, a Waste Management Plan has been approved for the project. Per the project’s approved Waste Management Plan, the project would divert 96 percent of the demolition materials. The project would divert 89 percent of construction debris, beating the target of 75 percent landfill diversion. Additionally, the project would implement a target of 20 percent recycled materials. The project would comply with the Uniform Building Code and Title 24 requirements for building materials and insulation in order to reduce unnecessary loss of energy.</p>

Sustainable Energy	
<i>Policy CE-I.5.b.</i> Promote the use and installation of renewable energy alternatives in new and existing development.	Consistent- The project provides for a number of sustainable design features, to include low water usage appliances, drought tolerant landscaping, solar, and promotion of recycling on-site. Photovoltaic infrastructure is incorporated into the rooftop shade structures on the upper level of the parking garage.
<i>Policy CE-I.10.</i> Use renewable energy sources to generate energy to the extent feasible.	
Urban Runoff Management	
Goal: Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands.	Consistent - Compliance with the General Construction Permit, the Municipal Stormwater Permit and the City of San Diego Stormwater Standards Manual will reduce impacts to water quality. The proposed project will reduce runoff rates and duration. Project development will be two feet above the mapped flood elevation and the Applicant will process a Conditional Letter of Map Revision per City and FEMA requirements, which demonstrates that there would be no rise in surface elevation of the river and no upstream or downstream affects.
Goal: Preservation of natural attributes of both the floodplain and floodway without endangering life and property.	
Air Quality	
Goal: Regional air quality which meets state and federal standards.	Consistent – As discussed in EIR Section 5.4 (Air Quality), emissions associated with the proposed project would meet regional air quality standards.
Goal: Reduction in greenhouse gas emissions effecting climate change.	Consistent – As discussed in EIR Section 5.5 (GHG), emissions associated with the proposed project would be below a level of significance. Additionally, the CAP Consistency Checklist has been completed for the proposed project and the project was found to be in compliance.
<i>Policy CE-F.4.</i> Preserve and plant trees, and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.	Consistent – The project would preserve trees, as practical, that are existing on-site. Furthermore, the project provides an extensive and varied landscape palette that includes an array of drought-tolerant plants, including native and native-friendly trees appropriate for USDA Plant Hardiness Zone 10b and the riparian adjacency. Vegetation would be consistent with water conservation policies and absorb carbon dioxide and pollutants.
<i>Policy CE-F.6.</i> Encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking. Continue to implement programs to provide City employees with incentives for the use of alternative to single-occupancy vehicles.	Consistent – The project includes a number of alternatives to single-occupancy vehicles. The project is located within walking distance of Fashion Valley Transit Center, which provides local and regional mass transit opportunities via bus and light-rail transit. The project site is walking distance to Fashion Valley Mall, a regional mall, is located north of the project site. Other employment and retail opportunities are located within walking or local transit distance, to include Hazard Center mall, northeast of the project site; Westfield Mission Valley West shopping center, east of the project site; and Hazard Center East, northeast of the project site. The project would provide 140 bicycle parking spaces, to accommodate

	resident, employee, and visitor bicycles. The project would implement a TDM program that would provide requirements to cash-out employees for not using parking in all leases with commercial tenants and parking spaces for residents shall be leased separate from the rental of apartment homes. Additionally, the project include 48 home business focused residential units that will have access to over 3,500 square feet of dedicated business center space, provide private cubicles and conference space for telecommuting residents.
Urban Forestry	
<i>Policy CE-J.1.b.</i> Plant large canopy shade trees, where appropriate and with consideration of habitat and water conservation goals, in order to maximize environmental benefits.	Consistent – The proposed project has been designed to retain, where feasible, 24 of the existing mature trees along the Camino de la Reina Street frontage, including 19 California Sycamores, four Torrey Pines, and one Indian Laurel. The preservation of these trees will maintain the existing visual character of the area to the fullest extent possible. The streetscape is being supplemented with additional parkway trees, groundcover, and low growing shrubs.
Noise Element	
Noise and Land Use Compatibility	
<i>Policy NE-A.4.</i> Require an acoustical study consistent with Acoustical Study Guidelines for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines (Table NE-3 of the General Plan), so that noise mitigation measures can be included in the project design to meet the noise guidelines.	Consistent – As discussed in EIR Section 5.7 (Noise), the proposed project would implement this goal by avoiding noise impacts to the extent practicable, and minimizing unavoidable impacts through project design features such that no significant impacts occur.
Motor Vehicle Noise	
<p><i>Goal:</i> Minimal excessive motor vehicle traffic noise on residential and other noise-sensitive land uses.</p> <p><i>Policy NE-B.1.</i> Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.</p> <p><i>Policy NE-B.3.</i> Require noise reducing site design, and/or traffic control measures for new development in areas of high noise to ensure that the mitigated levels meet acceptable decibel limits.</p>	Consistent – As discussed in EIR Section 5.7 (Noise), the proposed project would implement this goal by avoiding noise impacts to the extent practicable, and minimizing unavoidable impacts through project design features such that no significant impacts occur.
Commercial and Mixed-Use Activity Noise	
<p><i>Goal:</i> Minimal exposure of residential and other noise-sensitive land uses to excessive commercial and mixed-use related noise.</p> <p><i>Policy NE-E.1.</i> Encourage the design and construction of commercial and mixed-use structures with noise attenuation methods to minimize excessive noise to</p>	Consistent – As discussed in EIR Section 5.7 (Noise), the proposed project would implement this goal by avoiding noise impacts to the extent practicable, and minimizing unavoidable impacts through project design features such that no significant impacts occur.

<p>residential and other noise-sensitive land use.</p> <p><i>Policy NE-E.2.</i> Encourage mixed-use developments to locate loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other high-noise components away from the residential component of the development.</p>	
Construction, Refuse Vehicles, Parking Lot Sweepers, and Public Activity Noise	
<p><i>Goal:</i> Minimal exposure of residential and other noise-sensitive land uses to excessive construction refuse vehicles, parking lot sweeper-related noise and public noise.</p> <p><i>Policy NE-G.1.</i> Implement limits on the hours of operation for non-emergency construction and refuse vehicle and parking lot sweeper activity in residential area and areas abutting residential areas.</p> <p><i>Policy NE-G.2.</i> Implement limits on excessive public noises that a person could reasonably consider disturbing and/or annoying in residential areas and areas abutting residential areas.</p>	<p>Consistent – As discussed in EIR Section 5.7 (Noise), the proposed project's construction activity would occur during allowable times and generate sound levels below 75 dBA Leq (12 hours), in compliance with Section 59.5.404 of the City of San Diego Municipal Code.</p>
Typical Noise Attenuation Methods	
<p><i>Goal:</i> Attenuate the effect of noise on future residential and other noise-sensitive land uses by applying feasible noise mitigation measures.</p> <p><i>Policy NE-I.1.</i> Require noise attenuation measures to reduce the noise to an acceptable noise level for proposed developments to ensure an acceptable interior noise level, as appropriate, in accordance with California's noise insulation standards (CCR Title 24) and Airport Land Use Compatibility Plans.</p> <p><i>Policy NE-I.2.</i> Apply CCR Title 24 noise attenuation measures requirements to reduce the noise to an acceptable noise level for proposed single-family, mobile homes, senior housing, and all other types of residential uses not addressed by CCR Title 24 to ensure an acceptable interior noise level, as appropriate.</p>	<p>Consistent – As discussed in EIR Section 5.7 (Noise), the proposed project would implement this goal by avoiding noise impacts to the extent practicable, and minimizing unavoidable impacts through project design features such that no significant impacts occur.</p>
Housing Element	
<p><i>Goal:</i> Ensure the provision of sufficient housing for all income groups to accommodate San Diego's anticipated share of regional growth over the next housing element cycle, 2013-2020, in a manner consistent with the development pattern of the Sustainable Communities Strategy (SCS), that will help meet regional GHG targets by improving transportation and land use coordination and jobs/housing balance, creating more transit-oriented, compact and walkable communities, providing more</p>	<p>Consistent – The proposed project is a mixed-use development integrating high-density residential and a variety of retail uses, with enhanced pedestrian and bicycle connections both on- and off-site. The Fashion Valley Transit Center is within short walking distance from the site.</p> <p>The proposed project includes significant functional and physical integration of project components, including uninterrupted pedestrian connections, both</p>

<p>housing capacity for all income levels, and protecting resource areas.</p> <p>Objective: Identify and make available for development adequate sites to meet the City's diverse housing needs.</p> <p><i>Policy HE-A.3.</i> Through the community plan update process, designate land for a variety of residential densities sufficient to meet its housing needs for a variety of household sizes, with higher densities being focused in the vicinity of major employment centers and transit service.</p> <p>Goal: Cultivate the City as a sustainable model of development.</p> <p>Objective: Promote the reduction of GHG in accordance with SB 375 and the California Long-Term Energy Efficiency Strategic Plan; and promote consistency with the General Plan's City of Villages Strategy and other Citywide planning efforts.</p> <p><i>Policy HE-J.3.</i> Seek to locate higher-density housing principally along transit corridors, near employment opportunities, and in proximity to village areas identified elsewhere in community plans.</p>	<p>within the project and to adjacent developments. The proposed project includes multi-family residential units to partially meet the housing needs of the community, adjacent to employment opportunities and retail uses.</p>
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CITY OF SAN DIEGO CLIMATE ACTION PLAN

The City of San Diego adopted a CAP in December 2015. The CAP quantifies GHG emissions; establishes citywide reduction targets for 2020 and 2035; identifies strategies and measures to reduce GHG levels; and provides guidance for monitoring progress on an annual basis. The City of San Diego CAP identifies a comprehensive set of goals and actions, including ordinances, policies, resolutions, programs, and incentives, that the City can use to reduce GHG emissions. The CAP includes strategies and actions that encourage (1) water and energy efficiency buildings, (2) clean and renewable energy, (3) bicycling, walking, transit and land use, (4) zero waste, and (5) climate resiliency. The City has adopted a CAP Consistency Checklist to determine compliance with the CAP. The CAP Consistency Checklist was completed for the proposed project (Appendix P) and the project was found to be in compliance without exception. See also Section 5.5, *Global Climate Change*, for a detailed discussion of greenhouse gas emissions and the project's consistency with the CAP.

MISSION VALLEY COMMUNITY PLAN

The project is located within the Mission Valley Community Plan area. Provided in this analysis are the applicable objectives, proposals, and development guidelines of the Community Plan for the proposed project.

Section 5.1.1, *Existing Conditions*, above, presents the relevant objectives, proposals, and development guidelines of the Mission Valley Community Plan for the project. Table 5.1-2, *Mission Valley Community Plan Consistency Analysis*, includes the previously identified goals and policies and a discussion relative to the project's consistency with the respective goals and policies.

Table 5.1-2. Mission Valley Community Plan Consistency Analysis

Land Use	
Residential	
<p>Objective. Provide a variety of housing types and densities within the community.</p> <p>Objective. Encourage development which combines and integrates residential uses with commercial and service uses.</p> <p>Proposal. Provide amenities for residents such as recreation, shopping, employment and cultural opportunities within or adjacent to residential development.</p> <p>Development Guideline. Provide amenities intended primarily for use by residents.</p> <p>Development Guideline. Encourage a wide variety of housing types and styles. Although detached single-family dwellings are probably not feasible, there are still many options available.</p> <p>Development Guideline. Encourage close, easy access between residences and daily shopping facilities.</p>	<p>Consistent - The project provides for a variety of housing types on-site; provides for residential amenities such as recreation, shopping, and employment; and provides easy access between the residential and commercial elements.</p>
Commercial	
<p>Objective. Encourage multi-use development in which commercial uses are combined or integrated with other uses.</p> <p>Proposal. Provide neighborhood/convenience commercial facilities near, or as part of, residential developments.</p> <p>Development Guideline. Provide parking garages as an integral part of new development utilizing existing ground level spaces for retail activity. These parking garages should be adjacent to public streets.</p> <p>Development Guideline. Provide commercial-retail development in areas that are pedestrian-oriented and have pedestrian linkages to other pedestrian activity areas. Retail-oriented parking facilities should be located in close proximity to the developments.</p>	<p>Consistent - The project provides multi-use development, neighborhood commercial facilities as part of residential development, and integrates parking into the proposed development.</p>

Multiple Use Option	
<p>Objective. Provide new development and redevelopment which integrates various land uses into coordinated multi-use projects.</p> <p>Proposal. Combine uses within a multi-use project to create a 24-hour cycle of activity.</p> <p>Development Guideline. Encourage activity on a 24-hour basis within a development project by including one or more of the following types of uses in addition to office and retail: restaurants, theatres, hotels, residences.</p> <p>Guideline. Multi-use development projects should include separate vehicular access and delivery loading zones, people oriented spaces, compatibility with adjacent development, and uninterrupted pedestrian connections.</p>	<p>Consistent – The proposed project is a mixed-use development that integrates various land uses to include a variety of retail and residential uses and creates a 24-hour cycle of activity.</p> <p>The proposed project includes separate vehicular access and delivery loading zones, a “people-oriented” public recreational amenity space.</p>
Transportation	
Public Transit	
<p>Objective. Provide mitigation for traffic generation impacts through the provision and/or financing of public transportation facilities on a project-by-project basis.</p>	<p>Consistent - The project proposes an irrevocable offer of dedication (IOD) and deferred improvement agreement (DIA) for the widening of Camino De La Reina along the project frontage. In addition, the project would be responsible for restriping the project frontage following widening (to account for appropriate transitions) of Camino De La Reina to 3-lane Collector standards between Driveway 1 and Hotel Circle. The Fashion Valley Transit Center is within short walking distance (0.36 mile) from the site.</p>
Parking and Goods Delivery	
<p>Objective. Provide adequate off-street parking for all new development in Mission Valley.</p> <p>Proposal. Discourage on-street curbside parking.</p> <p>Proposal. Minimize conflicts between driveways and traffic flow.</p> <p>Proposal. Provide adequate, well-designed off-street parking facilities.</p> <p>Development Guidelines – Off-Street Parking. Provide attractively designed parking structures or underground facilities to reduce the area of a site which must be devoted to parking.</p> <p>Development Guidelines – Off-Street Parking. Driveways should not be permitted along primary arterials and major streets where lower classification streets are available to provide adequate access. If</p>	<p>Consistent- The project provides off-street parking, with the majority of project parking being in a parking garage that is wrapped within the residential development. Access to the project site occurs from three driveways off of Camino de la Reina.</p>

<p>driveways along major streets cannot be avoided, then design parking facilities to minimize the number of driveways needed. Private access roads may be used for combined parking areas.</p> <p>Development Guidelines - Off-Street Parking. Design parking facilities to ensure proper access and specify if for use by residents, employees, customers, visitors, goods delivery, or the handicapped.</p> <p>Development Guidelines - Off-Street Parking. Provide for safe and convenient pedestrian movement both within and to and from parking areas. Pedestrian ways should be incorporated into the design of parking areas so as to provide pedestrian passage through parking areas to pedestrian destinations (buildings, streets, etc.)</p>	
Pedestrian Circulation	
<p>Objective. Improve the visual quality as well as the physical efficiency of the existing and future pedestrian circulation system.</p> <p>Proposal. Provide adequate light in public areas.</p> <p>Development Guideline. Urban plazas and project recreational areas for the commercial, residential, hotel, and office development should have direct links to both the river and the public streets parallel to the river, re: Friars Road and Camino de la Reina.</p> <p>Development Guideline. Landscaped pedestrian sidewalks should be provided along all public streets to encourage pedestrian activity and expedite pedestrian access. Trees should be located adjacent to the curb to provide pedestrian scale and separation from vehicular activity without reducing normal sidewalk area. Tall, canopied trees are preferable to other trees.</p> <p>Development Guideline. Projects should front on the public street and provide identifiable pedestrian access from the street into the project, even in areas where parking lots are located between the street and the buildings.</p> <p>Development Guideline. Handicapped access must be provided to all areas of pedestrian activity, parking areas, buildings, pedestrian linkages, and the community-wide pedestrian system.</p>	<p>Consistent - The project would improve the visual quality as well as the physical efficiency of the existing and future pedestrian circulation system. The project provides easy pedestrian access from the road through the plaza, which is provided along Camino de la Reina, as well as other project entries along Camino de la Reina. The project features buildings that front on the public street and provide identifiable access from the street into the project. Pedestrian uses (retail) front on the main roadway and encourage pedestrian activity. Pedestrian areas are extensively landscaped.</p>
Conservation	
<p>Proposal. Conserve energy by utilizing alternative energy sources and energy-efficient building and site</p>	<p>Consistent - The project provides for a number of energy conservation features. Photovoltaic</p>

design principles.	infrastructure is incorporated into the rooftop shade structures on the upper level of the parking garage. The project would comply with the Uniform Building Code (UBC) and Title 24 requirements for building materials and insulation in order to reduce unnecessary loss of energy. Due to the presence of the I-8 freeway immediately south of the project site, the project orients the majority of its windows toward the other elevations, providing narrow, vertical-punched windows along the southern elevation to minimize sound exposure. Windows with sound transmission class (STC) ratings higher than those provided by standard building construction (STC-24 to STC-28) would be implemented for bedrooms and living rooms along and directly exposed to traffic on SR-163 and/or Camino De La Reina to comply with the City's requirements for interior noise levels, which would also allow for less heat transfer during summer months. Both evergreen and deciduous plant material are proposed throughout the project. As such, greater sun exposure would be afforded in winter months, allowing natural warming of units, with shading in summer months to allow for natural cooling.
Urban Design	
Design Guidelines for Landmarks. The gateways, or entrances, into the community are [a] type of landmark. Being crisscrossed by regional freeways, Mission Valley has many of them. Each should provide a clear view into, as well as through, the community. New development located at these entrances will also become community landmarks, and should be designed with that in mind.	Consistent - As the project area is considered a gateway to the community, the project would be designed in such a manner as to visually open this gateway area (with the use of glass façades along the southwest corner of the project building and siding of an open gathering space). Additionally, the extended setback and Nature Walk create a park like setting for entry into this portion of Mission Valley
<p>Design Guideline for Solar Access. Buildings should orient the majority of their glass areas to the south, and deciduous trees should be located on that southern facade. This allows sun to warm the building in winter, when it is highly desirable, while providing shade in the warmer summer months.</p> <p>Design Guideline for Solar Access. Building facades should incorporate overhangs or canopies to shade direct sun and reduce heat gain.</p>	Inconsistent - The project would not be consistent with the solar access design guideline calling for buildings to orient the majority of their glass areas to the south. The I-8 freeway is located to the south of the project site, creating a substantial amount of noise. The project would orient the majority of its windows toward the other elevations, providing narrow, vertical-punched windows along the southern elevation to minimize sound exposure. The materiality of the exterior of the building is predominately textured cement plaster. The color scheme is built up of muted tones browns, grays and greens to compliment the natural colors of the nearby riparian foliage. The lighter colored materials will help reflect the sun's rays and reduce the amount of heat absorbed by the buildings. The project includes a wrapped parking structure that has a roof level fully exposed to open sky. As such, the project design incorporates photovoltaic infrastructure into the rooftop shade structures on the upper level of the

	parking garage. These shade structures will both generate alternative energy and provide shade over the pavement to reduce heat gain. This inconsistency does not result in a significant environmental effect, however, because the goal of this design guideline is to provide solar access to minimize energy demand, which is already encapsulated in project design due to the project's sustainable features.
<p>Design Guideline for Water Conservation. Buildings should be designed with mechanisms that will reduce water consumption. The following water saving devices should be considered: Low flow plumbing fixtures; cycle adjustment machines; pressure regulators to maintain water pressure to desirable conservation levels; hot water pipe insulation; and, automatic sprinkler systems.</p> <p>Design Guideline for Water Conservation. Water should be conserved by using low maintenance drought tolerant plant material, and the use of inert landscape materials (rocks, gravel, ornamental paving) and sculptured forms.</p>	Consistent - The project would provide for sustainable and low water usage development. The project would comply with the Uniform Building Code (UBC) and Title 24 requirements for building materials and insulation in order to promote water conservation within building operation. The project incorporates water-conserving irrigation, including state of the art equipment that distributed water in controlled amounts and at controlled times to maximize water efficiency and optimize plant growth, irrigation systems control to allow water to be distributed to plant material with similar watering needs to avoid overwatering, use of weather and rain sensors to monitor current conditions and control the system accordingly, and utilization of reclaimed water (when available) for irrigation minimizing the need for potable water in the landscape. Additionally, the project provides an extensive and varied landscape palette that includes an array of drought-tolerant plants, including native and native-friendly trees appropriate for USDA Plant Hardiness Zone 10b and the riparian adjacency. Vegetation would be consistent with water conservation policies.
Multiple Use Development Option	
Objective: Provide new development and redevelopment which integrates various land uses into coordinated multiuse projects.	Consistent - The proposed project integrates new residential and a variety of retail uses within the existing fabric of commercial, office, residential, and visitor-serving uses.
Proposal: Include a variety of revenue-producing uses in each large-scale multi-use project.	Consistent - The proposed project includes a variety of revenue-producing uses, including new residential and a variety of retail uses.
Proposal: Ensure functional and physical integration of the various uses within the multi-use project and between adjacent uses or projects.	Consistent - The proposed project includes significant functional and physical integration of project components, including uninterrupted pedestrian connections, both within the project and to adjacent developments.
Development Guideline: Multi-use development projects should include all of the following design elements: (a) Separate vehicular access and delivery loading zones. (b) People-oriented spaces. (c) Compatibility with adjacent development. (d) Uninterrupted pedestrian connections.	Consistent - The proposed project includes: (a) separate vehicular access and delivery loading zones for the commercial and industrial uses, (b) six amenity areas for use by residents, employees, and visitors to the site, (c) compatibility with adjacent development.
Development Guideline: Encourage activity on a 24-hour basis within a development project by including	Consistent - The proposed project includes multi-family residential buildings incorporated with a variety

one or more of the following types of uses in addition to office and retail: (a) Restaurants, (b) Theatres, (c) Hotels, (d) Residences.	of retail uses.
Development Guideline: Multi-use development projects should be processed and evaluated through the use of PCD permits and/or Specific Plans.	Consistent – The proposed project will be processed and evaluated through a Planned Development Permit.
Characterization: Public transit opportunities and commitments and permanent pedestrian linkages to public transit systems.	Consistent – The proposed project is located within walking distance to the Fashion Valley Transit Center and enhances the permanent pedestrian access from the site to the transit center.
Characterization: Interconnection of project components through an elaborate pedestrian circulation network (e.g., subterranean concourses, walkways and plazas at grade and aerial bridges between buildings).	Consistent – Pedestrian linkages are provided throughout the project site. The project has been designed with a primary focus on pedestrian access and the focus of this occurs at The Perch and The Oasis (the project's main access).
Characterization: Multi-use projects may also include separate structures on separate parcels of land providing that the creation of parcels and designation of uses is the result of a plan approved for the entire designated project and it meets the basic criteria for a multi-use project.	Consistent – The proposed project is centered around a locally focused plaza providing for structural integration of all uses on the site. Residential and retail uses, as well as amenity areas, provided on-site as interconnected uses.
Policy: Provide a landscaping plan to tie the various uses together.	Consistent – The proposed project includes a landscaping plan complete with pedestrian focal points.
Policy: Provide careful positioning of key project components around centrally located focal points (e.g., a shopping gallery or hotel containing a large central court).	Consistent – The proposed project features two amenity areas, The Oasis and The Nest, intended to serve resident, employees and patrons of the project's retail offerings. The Oasis, located between the leasing office, fitness center, and retail components in the southern portion of the project site, provides a plaza-like setting. The Nest, located in the southwest corner of the site would provide an outdoor dining patio adjacent to the restaurant component as well as a specimen tree and wall fountain to provide ambiance. This site design creates a flow between each use connecting residents to retail, employees to retail, residents to employment opportunities, and employees to their place of residence.

MISSION VALLEY PLANNED DEVELOPMENT ORDINANCE

Zoning and development regulations for the project are provided in the Mission Valley Planned Development Ordinance (PDO). Pertinent development regulations and the proposed project parameters are illustrated in Table 5.1-3, *Mission Valley PDO Development Regulations*.

Table 5.1-3. Mission Valley PDO Development Regulations

Regulation	Mission Valley PDO	Proposed Project
<i>Minimum Lot Dimension</i>		
Area	5,000 sq. ft.	214,315.2 sq. ft. (4.92 acres)
Street Frontage	50 ft.	> 50 ft.
Width	50 ft.	> 50 ft.
<i>Max. Structural Coverage</i>	50%	42%
<i>Setbacks</i>		
Minimum Street Yard Factor: 20	Minimum Street Yard Required – 20,540 sq. ft.	Total Street Yard Provided – 36,138 sq. ft.
Min. Street Yard Setback	10 ft.	15 ft.
Min. Property Side Setback	10 ft.	15 ft.
Rear Setback	8 ft.	8 ft.

¹ Minimum area of street yard(s) - Street yard(s) shall be provided for each lot at a minimum area calculated by multiplying the linear feet of any street frontage by a factor of 25. Where one permit area has more than one side of street frontage, the area on each street yard shall be calculated separately.

In all cases, the project would meet the Development Regulations of the PDO presented in Table 5.1. No impacts relative to development regulations would result.

The PDO requires that all commercial and multiple use structures contain an identifiable pedestrian entrance from the street into the project and that safe passage be provided through parking areas. Pedestrian circulation for the project is shown in Figure 3-7, *Alexan Fashion Valley Access Plan*. As shown, pedestrian access is identified at several locations. Public sidewalks would provide access along Camino de la Reina. Access into residential buildings and commercial aspects of the site would occur from the public sidewalk, and additional pedestrian paths throughout the project would be provided. The retail uses proposed along Camino de la Reina would have access directly from Camino de la Reina. Safe pedestrian access is also identified through the public parking area located along the eastern portion of the site.

For areas located adjacent to Major Pedestrian Paths as shown in the Community Plan (see Figure 5.1-2, *Mission Valley Community Plan – Pedestrian Circulation System*), the PDO also requires the following:

- The dominant feature of all ground floor frontage of all new or reconstructed first story building walls that face a Mission Valley Community Plan identified “Major Pedestrian Path” shall be pedestrian entrances and windows affording views into retail consumer services, offices, lobby space, or display windows.
- Where a project is bounded on one or two sides by major pedestrian paths, parking structures shall not be located between the buildings and the major pedestrian path(s).
- Where a project is bounded on three or more sides by major pedestrian paths, parking structures are not permitted between the building and two of these paths.

As shown in Figure 5.1-2, the project site is bounded by one Major Pedestrian Path located along Camino de la Reina. In accordance with the PDO, the pedestrian access and entrances are predominate in this frontage. Windows of retail space would front on Camino de la Reina, as well as a plaza that would be open to the public. No parking structures would be located between the retail buildings and the Major Pedestrian Path.

Relative to architectural design, the PDO requires that all commercial or mixed-use structures provide at least two of the features listed below:

- Slim Tower - To maximize view corridors to the river and hillside areas, the upper levels of the structure shall diminish in size to create a slimmer silhouette than the lower levels of the structure. This feature is particularly desirable for buildings over 100 feet high located along major north-south streets.
- Plaza - To create a pedestrian gathering spot, provide a landscaped/hardscaped area that is open to the sky at street level and visually and physically accessible from a major pedestrian path or public right-of-way. The plaza should have a focal point such as a sculpture, garden, or fountain and are to be located readily adjacent to the public right-of-way. This feature would be especially suited to structures located along Mission Valley Community Plan identified "Major Pedestrian Paths".
- Roof Element - To create a unique skyline and enhance views of building tops from above flat or unusable roof area shall be minimized.
- Architectural Detail - To increase interest in the community through variations in building facades, architectural detail may include material and color variations, bay windows, awnings, columns, cornices, eaves, window casings or any combination of these or other similar elements acceptable to the City Manager.
- Offsetting Surfaces - To break up building mass to achieve a more human scale, each building wall elevation which faces any street or river yard shall have building offset variations, acceptable to the City Manager.

The project would be consistent with the architectural design requirements of the PDO. Specifically, the project would create a hardscape plaza that would be open to the sky and visually and physically accessible from Camino de la Reina – identified as a Major Pedestrian Path. As presented in Section 3.0, *Project Description*, the project proposes articulated and varying rooflines and would create a unique skyline and provides architectural detail that enhances community character and interest. Off-setting planes and building articulation, along with pedestrian-scale elements, provide architectural variation along public streets which aid in breaking up the building mass.

Other requirements of the PDO applicable to the project call for adherence to the City's Landscape Regulations (Land Development Code Chapter 14, Article 2, Division 4) and Parking Regulations (Land Development Code Chapter 14, Article 2, Division 5). The project would be in compliance with those regulations.

The PDO also includes *Special Regulations* that would apply to the project site and proposed development. The purpose of these regulations is to supplement the regulations of the underlying zones and sub districts in order to focus on the circulation system elements of private and public development projects, site and building design features that affect public views, and signage.

Relative to landscaping, in addition to meeting the City's Landscape Regulations, the PDO also requires that:

- Pedestrian sidewalks separated from the street by landscaped parkways shall be provided in relation to street classification.
- The placing of signs, utilities and other public facilities shall be done in a manner so as to provide the clear unobstructed corridor sidewalk width and parkway design as required by the Mission Valley Planned District Ordinance.
- Sidewalks and parkways are to be provided in accordance with Table 1514-04A of the PDO, which requires that a 10-foot wide sidewalk and eight-foot wide parkway be provided along Camino de la Reina.

LDC Section 1514.0402(b)(1) states that pedestrian sidewalks separated from the street by landscaped parkways shall be provided in relation to the street classification as shown in Table 1514-04A. Section 1514.0402(b)(1) allows the decision maker to permit the widths of the parkway and sidewalk to diminish to accommodate such features as bus stops, transformer boxes, or other site constraints.

The project would not meet the requirements of Section 1514.0402(b)(1) for Camino de la Reina, which fronts the project site on the north and west. Camino de la Reina is classified as a four-lane collector. Table 1514-04A requires an eight-foot wide sidewalk along four-lane collectors, separated from the roadway by a six-foot wide landscape parkway. The project proposes a 4.5-foot wide contiguous sidewalk along Camino de la Reina and a five- to 5.5-foot parkway adjacent to the sidewalk. Strict conformance with the sidewalk and parkway regulations of the Mission Valley PDO would result in the need to create walls along the sidewalk running the entire property along Camino de La Reina in order to raise the project site above the floodplain.

As a result of portions of the project being located within the floodplain, proposed structures must be raised. Raising the site a minimum of two-feet above the floodplain creates a manufactured slope along Camino de la Reina, transitioning down to the existing sidewalk. The manufactured slope would provide 50 to 61 feet of separation between the public sidewalk and buildings proposed within the project. The existing sidewalk is contiguous to the street. The sidewalk proposed for the project would connect to off-site sidewalks that are also contiguous with Camino de la Reina.

The project has been designed with a primary focus on the pedestrian and pedestrian access and improving the pedestrian realm. The project proposes amenity features located along the public

right-of-way that would provide for pedestrian focus at the project edge. "Nature Walk," located on the northern and western perimeters of the project site, would provide a landscaped buffer between Camino de la Reina and the project buildings. Within this landscaped area, Nature Walk would include interpretive signage, a decomposed granite path, and native plants. "The Perch," located in the northwest corner of the project site, would provide a stepped entry to the main project area with a picnic area, and open lawn, and play elements, such as bocce ball. The Perch is intended to facilitate active social interaction and activate this corner of the project, which is adjacent to the direct connection leading to the street, Fashion Valley Mall, and Fashion Valley Transit Center. The project's resultant streetscene will be attractive, and the project's design features will be inviting to pedestrians and for public gathering.

The project does not affect pedestrian access nor detract from public views. Incorporating the project's design features into the active realm of the pedestrian through the provision of a two project amenity areas that connect directly to the public sidewalk results in a more desirable project than would be achieved if the project were to provide sidewalk and parkway widths designed in strict conformance with the regulations of the Mission Valley PDO, which would require that high retaining walls be constructed along the project's frontage on Camino de la Reina.

Relative to parking and the community circulation system, the PDO requires that all parking (including surface lots, parking structures, vehicle parking, bicycle parking, and loading spaces) comply with City ordinances. The PDO states that surface parking should include pedestrian access that is safe, useable, and connects through parking areas to building entrances; driveway widths are to meet City standards; and parking structures shall be designed accordance with City standards. The project would be in compliance with the PDO's Special Regulations pertaining to parking and community circulation. The parking structure and surface parking areas have been designed in accordance with City requirements. Safe pedestrian access is also identified through the surface public parking areas adjacent to the commercial buildings and connects with building entrances and through the pedestrian plaza.

Based on the PDO's *Supplemental Design Requirements*:

- Buildings located north of Interstate 8 and south of Friars Road shall not exceed 250 feet in height.
- Reflective building material should not be used in a way which causes a traffic hazard, diminishes the quality of riparian habitat, or reduces the enjoyment of public open space.
- Flat roofs are limited to no more than 40 percent of the building's coverage, and separate flat roof elements must be differentiated by an elevation of at least five feet. If the amount of flat roofs exceeds 40 percent, then the flat roof element shall be designed as an architectural/landscape amenity to enhance the views from the proposed structure or adjacent structures. Such enhancement may consider roof gardens, architectural features, special paving and patterns or other comparable treatment.

The project would be in compliance with these requirements. Building heights within the project would not exceed 69 feet. Section 142.0730 of the City's Land Development Code regulates glare. Section 142.0730 limits a maximum of 50 percent of the exterior of a building may be comprised of reflective material that has a light reflectivity factor greater than 30 percent. Additionally, reflective building materials are not to be permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space. The project proposes flat roofs. However, the project has been designed with varying levels of the roof and varying parapet heights throughout.

With regard to enclosures, the PDO requires that no utility equipment, mechanical equipment, tank, duct, elevator enclosure, cooling tower, or mechanical ventilator be erected, constructed, maintained, or altered anywhere on the premises unless all such equipment and appurtenances are contained within a completely enclosed penthouse or other portion of a building having walls or visual screening with construction and appearance similar to the main building. Fences and walls shall adhere to the Fence Regulations in the Land Development Code (Chapter 14, Article 2, Division 3). In accordance with City regulations, all rooftop equipment for the project would be enclosed and/or screened. Use of walls is limited on the project. Where walls are proposed, they have been designed in accordance with the City's Fence Regulations.

Signage for developments located within the Mission Valley PDO shall be in compliance with the City's Sign Permit Procedures (Land Development Code Chapter 12, Article 9, Division 8) and the City's Sign Regulations (Land Development Code Chapter 14, Article 2, Division 12). While the PDO includes some exceptions, none of those would apply to the project. The project would be in conformance with the City's Sign Regulations.

Relative to lighting, the PDO calls for all artificial lighting to be directed or shaded so as not to fall onto adjacent properties not held in the same ownership. This requirement is the same as that required by the City's lighting regulations. (Light and glare is addressed in detail in Section 5.3, *Visual Effects/Neighborhood Character*, of this EIR.) The purpose of the City's outdoor lighting regulations is to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. Regulation of outdoor lighting is also intended to promote lighting design that provides for public safety and conserves electrical energy. New outdoor lighting fixtures must minimize light trespass in accordance with the Green Building Regulations where applicable, or otherwise shall direct, shield, and control light to keep it from falling onto surrounding properties. No direct-beam illumination is permitted to leave the premises. The City's lighting regulations require that most outdoor lighting be turned off between 11:00 P.M. and 6:00 A.M. with some exceptions (such as lighting provided for commercial and industrial uses that continue to be fully operational after 11:00 P.M., adequate lighting for public safety). The project would adhere to these regulations.

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

The PDO provides *Guidelines for Discretionary Review* which would apply to the project. The following specific Guidelines would be applicable:

- Building height, spacing, and bulk should be designed to create landscaped see-through areas from projects to community landmarks and open space features.

The Mission Valley Community Plan describes the many gateways, or entrances, into the community as a type of landmark, where development should provide a clear view into, as well as through, the community. The project has been designed to be sensitive to community views, as described in Section 5.3, *Visual Effects/Neighborhood Character*. Buildings would setback and view openings to and from the project are provided at the various amenity areas.

- Incorporate crime inhibiting design principles into project design.

Crime inhibiting design principles have been incorporated into the project design, such as the provision of multiple uses to create 24-hour life on the site; access control to properly locate entrances, exits, fencing, landscaping and lighting can subtly direct both foot and vehicular traffic in ways that decreases criminal opportunities; and well-defined spaces.

- Incorporate employee services (restaurants, cleaners, showers etc.) into developments. Restaurant space would be provided as part of the project.

- Long term maintenance for all vegetation should be provided in accordance with adopted City-wide landscape standards.

All landscaping would be maintained by the project developer.

- Roofs should be designed to enclose mechanical equipment and to be used for recreational, retail, or restaurant uses.

As previously stated, rooftop equipment would be designed in accordance with City regulations, which require enclosed or screening of all rooftop equipment.

- **Parking Areas**
 - Landscape parking areas with long lived, round headed trees that have a mature height and spread of at least 30 feet, screening hedges and shrubs, and mounding around the edges. Turf areas should be minimized. The adopted city-wide landscape regulations should be used as a minimum standard.
 - Use trees and plants as the dominant elements of major project entries.
 - Screen parking areas with berms and landscaping.
 - Patterned paving may be substituted for part of the living landscaping requirement.
 - A minimum 10 percent of the parking lot area should be landscaped.

As described in Section 3.0, *Project Description*, the project includes a comprehensive landscape plan. Landscaping of parking areas is proposed in accordance with the City's Landscape Regulations. Solar panels would be provided on the rooftop of the parking garage. Project entrances would be enhanced with trees and shrubs.

- **Bicycle Facilities**
 - Provide secure bicycle parking at activity areas, transit stops, commercial areas and sports/ recreational facilities.
 - Bicycle parking facilities should include both bicycle racks and bicycle lockers. Bicycle lockers should be provided for employees arriving by bicycle at major activity centers.
 - Bicycle parking facilities should be located close to the entrance of the activity center.

The proposed project would provide 140 bicycle parking spaces (including 122 for residential units, plus 10 short-term and 8 long-term parking spaces for commercial uses), which exceeds the City's Municipal Code (Chapter 14, Article 2, Division 5) requirement of 130 bicycle parking spaces.

Additionally, the project will provide one shower stall and two personal effects lockers for office uses in accordance with the voluntary measures under the California Green Building Standards Code.

- **Pedestrian Circulation**
 - Convert street space to wider sidewalks, landscaped strips, and sitting areas where pedestrian traffic is high.
 - Sharply delineate walkways from traffic areas, using grade separations between high activity areas that minimize stairs or pedestrian ramps. For example, pedestrian bridges or tunnels could be used to connect activity areas across high speed, high volume streets and skyways could be constructed between buildings.

- Provide pedestrian amenities such as public plazas, canopies, patterned sidewalks, information kiosks, benches and adequate lighting along sidewalks and pedestrian paths through and between developments located along transit corridors.
- Locate tall, canopied trees adjacent to the curb, between the street and sidewalk, in accordance with Land Development Code Chapter 14, Article 2, Division 4 (Landscape Regulations).
- Projects should front on the public street and provide pedestrian access from the street.
- Provide safe routes between and through the interior of developments. Routes should be separated from vehicular traffic, and distinguished by paving, slopes, landscaping, retail uses, public events, food sales, public art, sitting areas and adequate lighting.

The project fronts on public streets and would provide pedestrian access from the street. The project would install pedestrian sidewalks on public streets abutting the project site and construct safe and identified pedestrian paths throughout the project, connecting office spaces, retail uses, and residential units. The project proposes a contiguous sidewalk along Camino de la Reina. Additionally, the project includes a non-contiguous decomposed granite pathway in the north and western portions of the site, which meanders in the space between the contiguous sidewalk and built area of the project site, providing spatial and topographic separation between pedestrians and automobiles. By providing both options of a contiguous sidewalk and non-contiguous pathway, the project is consistent with Policy ME.A.7.c, which encourages the “use of non-contiguous sidewalk design to help separate pedestrians from auto traffic.” All pedestrian access would be American’s with Disabilities Act (ADA) accessible. As part of the project’s landscape plan, street trees would be planted in the Nature Walk, which would also accommodate a non-contiguous undulating pathway. The project provides for an open plaza that would be accessible to the public.

- Noise
 - Separate development from freeways and busy roads through walls and/or landscaped berms. Wall design should incorporate landscaping materials and sculptural forms.
 - Buffer residential development from noise with setbacks or elevation differences.

Dwelling units fronting SR-163 (and I-8) and Camino De La Reina would be exposed to exterior noise levels exceeding 65 dBA CNEL (Community Noise Equivalent Level in A-weighted decibels). Balconies have been eliminated from residential units along SR-163, where noise levels exceed City standards. The project would provide useable and common open space elsewhere on the project site in excess of City requirements. Additionally, project design features would be implemented to comply with the California Building Code, Title 24, Section 1208A requirements for interior noise in habitable rooms and would reduce noise levels to comply with City requirements for interior noise levels. Air conditioning, a form of mechanical ventilation, would be implemented for all on-site dwelling units to ensure that windows can remain closed for prolonged periods of time. Windows with sound transmission class (STC) ratings higher than those provided by standard building construction (STC-24 to STC-28) would be implemented for bedrooms and living rooms along and directly exposed to

traffic on SR-163 and/or Camino De La Reina to comply with the City's requirements for interior noise levels.

- Water
 - Public and private developments should use recycled water and install water saving devices, where practical.
 - Control surface runoff by promptly planting disturbed sites with ground cover vegetation, and incorporating sedimentation ponds into flood control or runoff control facilities. Long term maintenance for all vegetation should be provided.
 - Preserve water by utilizing native, drought resistant vegetation for project landscaping in a manner consistent with the adopted city-wide landscape regulations.
 - Use water from the City's water reclamation project for irrigation.
 - Implement Department of Water Resources conservation and reclamation recommendations in development projects.
- Energy
 - Cluster buildings to use a common heating/cooling source.
 - Design buildings to allow for flow-through ventilation.
 - Use building materials which will act as insulators or conductors, depending on energy needs.
 - Use architecture, materials, and site planning to minimize energy use to maximize use of solar energy and to avoid casting shadows on existing buildings and public plazas. New structures should be designed so that no more than 50 percent of the area of a sidewalk, existing building, or public plaza should be shaded by the new structure for more than one hour between 11 a.m. and 2 p.m. to the extent feasible.

The project would be designed and developed utilizing sustainable development practices, which would be in compliance with these Guidelines. Some of the sustainable design features that would be included in the project and which directly respond to these Guidelines are: low flow water fixtures, high efficiency toilets, high efficiency irrigation system, drought tolerant landscaping, and eco-friendly construction materials and finishes. Additionally, project landscaping would be installed as soon as possible, and all landscaping would be maintained by the property owner. Buildings are designed to allow flow-through ventilation. The project includes low-rise structures with five and six stories. As such, buildings would not cast long shadows and would not result in lengthy periods of shading on sidewalks and existing buildings. The project's proposed plaza would not be shaded by project buildings or adjacent existing buildings.

- Landmarks
 - Provide view corridors to identified community landmarks through conditions of approval in specific plans and planned development permits.

- New development should complement and respect views of landmarks and community entrance areas. The freeways in particular are gateways which should provide a clear view into and through the community. New development located in community entrance areas should be designed to enhance these areas and should be reviewed for architectural style, building mass, landscaping and color.
- New developments may create landmarks through the development of vertical building elements.

Figure 5.1-3. *Mission Valley Community Plan Urban Design – Landmarks and Community Entrances*, shows the landmarks and community entrances and their relationship to the project. As shown in Figure 5.1-3, the project site is within a landmark/view sensitive area. The Mission Valley Community Plan describes the many gateways, or entrances, into the community as a type of landmark, where development should provide a clear view into, as well as through, the community. The project has been designed to be sensitive to community views. Building would setback from the roadways; view openings to and from the project have been provided at amenity areas.

- Signage
 - Signs and street graphics should complement the overall urban design goals for the community.
 - Signage for adjacent developments should be compatible and not attempt to "out-shout" each other.
 - Signage should complement the architectural design of buildings and developments.

Signage for the project would be in compliance with the City's Sign Regulations. As such, no significant land use impacts would result.

As shown on Table 5.2-3, *Alexan Fashion Valley Project Trip Generation*, up to 2,005 ADT is expected to be generated by the proposed project using Mission Valley Planned District Ordinance rates (Municipal Code Table 1514-03B). The Mission Valley Community is governed by a MVPDO which limits development intensity. According to the MVPDO (§1514.0301 (c) (1)), "Development intensity shall be limited by the number of ADT generated by the existing and proposed land uses of any development proposal." The project is located in Development Intensity District C. According to Table 1514-03A in the MVPDO, up to 417 ADT per gross acre is allowed within development threshold 2. For the 4.92-acre project site, the Community Plan would allow up to 2,050 ADT based on the allowable development threshold of 417 ADT per gross acre. Therefore, the proposed project is expected to generate fewer average daily trips than allowed under threshold 2 and would be consistent with the Community Plan.

SAN DIEGO RIVER PARK MASTER PLAN

The project is located within the River Influence Area of the San Diego River Park Master Plan. Provided in this analysis are the applicable recommendations of the River Park Master Plan for the

proposed project. Table 5.1-4, *San Diego River Park Master Plan Consistency Analysis*, includes the relevant recommendations and a discussion relative to the project's consistency with the respective recommendation.

Table 5.1-4. San Diego River Park Master Plan Consistency Analysis

Recommendation	Project Consistency
General Recommendations	
3.1.1 D. Encourage the growth of appropriate native riparian and upland vegetation.	Consistent – The project's landscape plan includes the use of indigenous plant material, no invasive or potentially invasive species would be utilized.
3.1.1 H. Future development projects should incorporate hydrology and water quality considerations in all planning and guidance documents and monitor water quality following implementation of the projects.	Consistent – The hydrology/drainage study (Appendix H) and Storm Water Quality Management Plan (Appendix K) were reviewed by the landscape architect and were taken into consideration when developing the project's landscape plans.
3.1.2 A. Establish appropriate corridors for the river, wildlife and people.	Not applicable. The proposed project is located outside the river corridor.
3.1.2 C. Eliminate invasive plant species and reintroduce native species.	Not applicable. The project is not located adjacent to the river and therefore would not involve any landscaping elimination or reintroduction along the river.
3.1.3 A. Create a continuous multi-use San Diego River pathway.	Not applicable. The project site is not located immediately adjacent to the San Diego River.
3.1.3 G. Integrate art into the identity and experience of the San Diego River Park.	Not applicable. The project is not located within the San Diego River Park.
3.1.5 A. Treat the river as an amenity.	Consistent – The proposed project treats the river as a desirable feature by taking advantage of the open space it creates and reflecting this natural element within the public plaza adjacent.
3.1.5 B. Encourage development to provide active uses fronting the river.	Not applicable. The project does not front the river.
3.1.5 C. Encourage development to face the river.	Consistent – The primary orientation of the project is to Camino de la Reina, which results in development facing the river beyond.
3.1.5 D. Include access to the river through new development.	Not applicable. The project is not located along the river.
3.1.5 G. Create "Green Streets."	Consistent – The proposed project has been designed to incorporate a palette of street trees, as well as a buffer of landscaped space along Camino de la Reina. The streetscape is being supplemented with additional parkway trees, groundcover, and low growing shrubs.
3.1.5 H. Enhance development edges facing the river with active uses.	Consistent – See response to 3.1.5 C above.
Specific Reach Recommendations – Lower Valley Reach	
A. Support the goals of the Mission Valley Preserve and provide additional interpretive signs on the role of the San Diego River in the Preserve.	Consistent – Interpretive signs for the San Diego River Park trail are included as part of the Nature Walk located on the northern and western perimeters of the project site.
B. Provide a connection between the San Diego River	Not applicable. The project site not near Presidio Park.

pathway and Presidio Park and a kiosk at Presidio Park to identify the river pathway. Provide a connection between Sefton Field to the south of the river and the YMCA to the north.	
C. Explore options at the Riverwalk Golf Course to extend the river pathway along the trolley corridor as a short term measure until the Riverwalk Golf Course is redeveloped into a multi-use development. When the redevelopment occurs, extend the river pathway along the River Corridor.	Not applicable. Riverwalk Golf Course is more than 1,000 feet west of the project site.
D. Pursue opportunities to address the hydrology of the river, to provide public parks and to orient the new development toward the river in Specific Plan areas, if amended.	Not applicable. The project is not located along the river.
E. Coordinate with Caltrans to establish "green gateways" at the intersection of State Highway 163 and Interstate 805 and the river valley by revegetating the freeway right-of-ways with native vegetation.	Not applicable. Project site not adjacent to the intersection of Highway 163 and I-805.
F. Construct bike and pedestrian crossings for the existing river pathway at FSDRIP at public street intersections, including Mission Center Road, Camino del Este and Qualcomm Way.	Not applicable. No existing river pathway or crossings at project site.
G. Create trail connections to the southern canyons of the Lower Valley, including Buchanan and Normal Heights Canyon, and to the northern canyons, including Murray, Murphy and Ruffin Canyons.	Not applicable. No connection to canyons at project site.
H. Create the river pathway connection from Fenton Parkway to I-15 and pursue opportunities to provide a pedestrian/bicycle connection over the river from Qualcomm Way to Mission City Parkway.	Not applicable. Project site two miles west of Fenton Parkway.
I. Consider public recreation, the San Diego River pathway and a naturalized open space along the river when planning any future use of the City's property at the Qualcomm Stadium site.	Not applicable. The project site is not near Qualcomm Stadium.
J. Provide interpretive signage along the river pathway about the rich history of the Lower Valley.	Consistent – interpretive signs for the San Diego River Park trail are included as part of the planned development.
River Influence Area	
4.4.2.1 Maximum Structural Development Coverage (For Mission Valley Planned District Ordinance Area only). The maximum structural development coverage of a parcel within 115 feet of the River Corridor Area in Mission Valley Planned District Ordinance area shall be 65 percent, all other areas along the river	Consistent – The portion of the project site within the River Influence Area has a lot coverage of 50 percent.
4.4.2.2. Building Height and Setback D. At 70-foot setback, the maximum building height allowed not to exceed 1-foot of setback per each 1-foot of building height (45 degrees). E. At the 115-foot setback, building height to be determined by the underlying zone.	Consistent - The nearest building to the 70-foot setback has a building height of 65 feet, where the maximum allowed height is 70 feet. At no point between the 70-foot setback and 115-foot setback does the building height in feet exceed the setback in feet.
4.4.2.3. Exterior Equipment Enclosures, Outdoor	Consistent - Exterior equipment enclosures, outdoor

<p>Storage, Loading Areas and Refuse Collection Areas Such areas and enclosures, including utility and mechanical equipment, to be located a minimum of 100 feet from the River Corridor Area and screened by landscaping and an opaque wall at least six feet high, or one foot higher than the item to be screened if item exceeds six feet in height. Opaque walls should be designed and constructed of the same quality of materials as the primary building façade. Enclosures should be paved and sufficiently impervious to contain leaks and spills, and have a roof or awning to minimize direct precipitation within the secondary containment area.</p>	<p>storage, loading areas, and refuse collection areas will be predominantly located at the rear of the project, in the eastern and southeastern portions of the site, as far from the River Corridor Area as the project site allows, greater than 100 feet from the River Corridor Area. These elements would be incorporated into project buildings or appropriately screened where they stand alone.</p>
<p>4.4.2.4 Off-Street Surface Parking Off-street parking should be sited to consider the sensitive nature of the river corridor but also promote a street scene that is conducive to pedestrians and responsive to principles of urban design. Off-street surface parking should be screened for the full length of the surface parking area with residential, commercial, industrial and/or mixed use development. Alternatively, off-street surface parking can be located a minimum of 20 feet from the River Corridor Area and screened by a landscape buffer. Within the landscape buffer plant material should be provided that achieve a minimum height of 30 inches along 80 percent of the length of the parking area along the River Corridor frontage within a two year period, except that screening is not required at pedestrian access points. Trees should be provided at a rate of one 24 inch box tree for every 30 feet of frontage along the River Corridor. Trees can be spaced apart, or provided in naturalized groupings. Parking areas that are screened by a landscape buffer should not exceed 30 percent of the length of the lot frontage cumulatively along the River Corridor or a maximum of 120 feet of the lot frontage along the River Corridor, whichever is less. Off-street surface parking should be designed to implement the City's Storm Water Standards Manual.</p>	<p>Consistent – Off-street surface parking is provided at the rear of the project, along the eastern and southeastern borders of the project site. Surface parking is screened by residential, commercial, and landscape elements.</p>
<p>4.4.2.5 Parking Structures Facades of parking structures facing the river to be screened from the River Corridor Area by permitted uses or a landscape buffer. Parking structures screened with permitted uses include residential, commercial, industrial and/or mixed use development and to be for the full height and width of the parking structure. Alternatively, parking structures could be located a minimum of 30 feet from the River Corridor Area and screened by a landscape buffer in accordance with the landscape buffer requirements described in Section 4.4.2.4 Off-Street Surface Parking.</p>	<p>Consistent – The project parking structure has been sited to face the SR-163 freeway, rather than the river. The parking structure is screened from view of the river by residential, commercial, and landscape elements.</p>

<p>Parking structures that are screened by a landscape buffer should not exceed 50 percent of the length of the lot frontage cumulatively along the River Corridor.</p>	
<p>4.4.2.6 Site and Parking Lot Lighting Site and parking lot lighting within 100 feet of the River Corridor Area should be designed to incorporate elements to reduce glare such as translucent, obscure or refracting lenses, low wattage light sources or shielding devices. Through the use of lighting design and shielding devices internal to the luminaire, there should be no light spillage into the River Corridor Area and lighting should be directed away from sensitive areas to ensure compliance with the MSCP's Land Use Adjacency Guidelines and to be in accordance with the Land Development Code Section 142.0740 (Outdoor Lighting Regulations).</p>	<p>Consistent - Site and parking lot lighting within 100 feet of the River Corridor Area would be designed to incorporate elements to reduce glare such as translucent, obscure or refracting lenses, low wattage light sources or shielding devices. Through the use of lighting design and shielding devices internal to the luminaire, and due to the project's distance from the river, there would be no light spillage into the River Corridor Area and lighting would be directed away from sensitive areas to ensure compliance with the MSCP's Land Use Adjacency Guidelines and to be in accordance with the Land Development Code Section 142.0740 (Outdoor Lighting Regulations).</p>
<p>4.4.2.7 Building Access to the River Corridor Area Development that abuts the River Corridor Area should provide the following:</p> <ul style="list-style-type: none"> d. Buildings facades to orient a primary facade and entrance, or its equal in design and materials to the River Corridor Area. e. A pedestrian path from the river side of the building to the San Diego River Pathway to be provided. Additional pedestrian paths to be provided for every additional 300 linear feet (minimum) of river frontage measured along the property line. f. The pedestrian path to be designed utilizing the same materials as the primary entrance. 	<p>Consistent - Building façades for the residential component of the project within the River Corridor Area would orient toward the River Corridor Area.</p> <p>Pedestrian access along the River Corridor Area side of the project connects to a public sidewalk which provides access via a crosswalk over Camino de la Reina to Avenida del Rio and the river path on the north side of the river.</p> <p>The pedestrian path within the Nature Walk would be decomposed granite. All other pedestrian pathways would be paved and enhanced at entry points.</p>
<p>4.4.2.8 Public Access Pathway Across Development Development that abuts the River Corridor Area to provide public pedestrian access pathways connecting the public street and the San Diego River Pathway consistent with the following:</p> <ul style="list-style-type: none"> A. At least one public pedestrian pathway for every 1,000 linear feet of frontage along the River Corridor Area per lot. B. The public access pathway should be part of the overall design of the site and a feature within the landscape design. This pathway should be the same design and materials as the primary on-site pathways. C. Directional signage, identifying public access to the San Diego River Pathway to be located at the intersections of the public access pathway and the street, and the public access pathway and the San Diego River Pathway. At a minimum the sign post to be on a galvanized mounted break-away post and the bottom of the sign to be 7 feet above finish grade. The sign face to be 	<p>Consistent - The project provides access to the public sidewalk and crosswalk that would provide access to the existing river path on the north side of the river. Within the Nature Walk, interpretive signage would be provided, including adequate directional signage.</p>

<p>constructed of a minimum 1/16 inches thick aluminum, sized no smaller than 18 inches wide by 24 inches tall. Sign to include the San Diego River Park logo and these words: "Public Access Pathway to the San Diego River". Lettering to be a minimum 1 inch wide and 3 inches in height.</p>	
<p>4.4.2.12 Location of Public Sidewalks Parallel to River Corridor Area</p> <ul style="list-style-type: none"> A. Streets with on-street parking or parking bays should have non-contiguous public sidewalks with some public sidewalk areas that connect to the street parking to function as an access point to the San Diego River Pathway. B. Streets without on-street parking should have non-contiguous sidewalks in the parkway. 	<p>Consistent – The project includes a non-contiguous pathway within the Nature Walk, in addition to the contiguous sidewalk along Camino de la Reina.</p>
<p>4.4.3.1 Building Massing</p> <p>To create visual interest, the building massing should vary in form and façade and avoiding repetition and monotonous walls. Building levels and planes should vary to create visual interest and to help define view corridors. To maximize view corridors to the river, the upper levels of the structure to diminish in size to create a slimmer silhouette than the lower levels of the structure. The building width facing the river at and above 70 feet in height above finish grade should be reduced by a minimum of 30 percent of the width of the building at the ground floor fronting the river.</p>	<p>Consistent – The building façade along the River Corridor Area would be articulated with wings of the buildings protruding north/south and building massing setback to accommodate amenity areas. Building heights above 70 feet are reduced by a minimum of 30 percent of the width of the building at the ground floor fronting the river.</p>
<p>4.4.3.2 Variety and Human Scale</p> <p>Interest, variety and human scale should be exhibited on building façades that face the River Corridor Area. Such variety is achieved by changes in building or roof form, recesses or extensions of the façade form, window and curtain wall patterns, shading devices, balconies, material changes, color variation, and surface pattern and texture changes.</p>	<p>Consistent – The building façade that faces the River Corridor Area would be varied by a combination of design elements, such as varying roofline, recesses and extensions of the façade form, shading devices, balconies, materials changes, color variation, and surface pattern and texture changes.</p>
<p>4.4.3.3 Building Transparency</p> <p>Building transparency applies to all commercial, mixed use or industrial building façades that front the River Corridor Area or building facades that front a street that abuts and runs parallel to the River Corridor Area, as follows:</p> <ul style="list-style-type: none"> A. Commercial and Mixed Use Zones: At least 50 percent of the ground floor building façade (between finish grade and the full height of the first floor) should be transparent. A minimum of 25 percent of each floor above the ground floor should be transparent. Transparency such as: glass windows, or windows affording views into retail, customer services, office, gallery, cafes, lobby space or pedestrian entrances. 	<p>Consistent – At least 50 percent of the ground floor building façade (between finish grade and the full height of the first floor) would be transparent. A minimum of 25 percent of each floor above the ground floor would be transparent. Transparency would include elements such as: glass windows, or windows affording views into retail, customer services, office, gallery, cafes, lobby space or pedestrian entrances.</p>

<p>4.4.3.4 Building Reflectivity</p> <p>All building façades that front the River Corridor Area, or building facades that front a street that abuts and runs parallel to the River Corridor Area, should incorporate non-reflective glazing types of materials to reduce the visible light reflectivity.</p>	<p>Consistent - The building façade that fronts the River Corridor Area incorporates non-reflective glazing types of materials to reduce the visible light reflectivity.</p>
<p>4.4.3.5 Building Lighting</p> <p>All lighting within 100 feet of the River Corridor Area should be shielded and directed away from the River Corridor Area and to be in accordance with Land Development Code Section 142.0740, (Outdoor Lighting Regulations).</p>	<p>Consistent - All lighting within 100 feet of the River Corridor Area would be shielded and directed away from the River Corridor Area and to be in accordance with Land Development Code Section 142.0740, (Outdoor Lighting Regulations).</p>
<p>4.4.3.6 Building Signs</p> <ul style="list-style-type: none"> A. Signs should be in accordance with Land Development Code, Chapter 12, Article 9, Division 8 (Sign Permit Procedures) and Chapter 14, Article 2, Division 12 (Sign Regulations). B. Within 100 feet of the River Corridor Area, signs on building facades fronting the River Corridor Area should not exceed a height of 15 feet above finish grade and are to be face lighted or internally lighted. C. Ground signs between the building and the River Corridor Area should be monument signs not to exceed 5 feet in height and located within a landscaped area at least equivalent to the square feet of the sign face. 	<p>Consistent – Project signage would be in accordance with Land Development Code, Chapter 12, Article 9, Division 8 (Sign Permit Procedures) and Chapter 14, Article 2, Division 12 (Sign Regulations).</p>
<p>4.4.4.1 Public Art for Private Development</p> <p>Art within the River Influence Area should be designed to celebrate and enhance the river experience, as well as to complement the natural colors and textures of the river valley where it is located. The placement of public art is encouraged to be viewed not only from the River Influence Area, but also from the San Diego River Pathway in the River Corridor Area. Art opportunities proposed for private property are encouraged, but will remain at the discretion of the private property owner. The City of San Diego Arts Commission can provide assistance for the selection process of artists on projects. Public art should be integrated into functional elements, such as site furnishings and signage, to engage and educate the public about the river park and its environs.</p>	<p>Consistent – Public art would be incorporated into interpretive signage along the Nature Walk within the project.</p>
<p>4.4.4.2 Fences and Walls</p> <p>Fences and walls should provide screening without visually walling-off the River Corridor Area. Within the 10-foot building setback from the River Corridor Area, the following fences and walls should be consistent with the following:</p> <ul style="list-style-type: none"> A. Solid fences or walls not exceeding 3 feet in height. 	<p>Not applicable – The project would not include fences within the River Corridor Area.</p>

<p>B. Fences or walls of 6 feet in height that are 75 percent open/transparent.</p> <p>C. A combination of a 3 feet solid fence or wall topped with a 3 foot fence or wall that is 75 percent open/transparent.</p> <p>D. For purposed of this section chain link fencing does not qualify as a 75 percent open fence.</p> <p>Chain link fencing should not be used in the 10-foot building setback and used only within landscape areas where plant material can screen the chain link and the chain link fence should have a green or black vinyl covering.</p>	
<p>4.4.4.3 Plant Material</p> <p>Plant materials within 15 feet of the River Corridor Area plant to be non-invasive low water use species and selected to complement the native plants in the River Corridor through color, texture and forms. Plant materials within the River Influence Area should frame and enhance views of the River Corridor Area. See Appendix "A" Recommended Plant Species, for a list of recommended plant materials for the River Influence Area. This list is not a mandate and should be used as a guide only.</p>	<p>Consistent – Project landscape palette within 15 feet of the River Corridor Area would be native, native-friendly (non-invasive), and drought tolerant.</p>

Significance of Impacts

The proposed project would be consistent with all applicable goals, policies, and objectives of the General Plan, with the exception of the Noise Element. Dwelling units fronting SR-163 (and I-8) and Camino De La Reina would be exposed to exterior noise levels exceeding 65 dBA. With regard to residential units fronting on SR-163/I-8, balconies have been eliminated from residential units along SR-163, where noise levels exceed City standards. The project would provide useable and common open space elsewhere on the project site in excess of City requirements. Additionally, project design features would be implemented to comply with the California Building Code, Title 24, Section 1208A requirements for interior noise in habitable rooms and would reduce noise levels to comply with City requirements for interior noise levels. Air conditioning, a form of mechanical ventilation, would be implemented for all on-site dwelling units to ensure that windows can remain closed for prolonged periods of time. Windows with STC ratings higher than those provided by standard building construction (STC-24 to STC-28) would be implemented for bedrooms and living rooms along and directly exposed to traffic on SR-163 and/or Camino De La Reina to comply with the City's requirements for interior noise levels. Although the project would not be consistent with the General Plan's Noise Element, project design features would ensure that there would be no significant noise impacts.

The project would be consistent with the Mission Valley Community Plan's objectives, proposals, and development guidelines, with the exception of a solar access development guideline within the Design Element (i.e. locating the majority of the project's glass areas on the south elevation). This

inconsistency does not result in a significant impact, as the solar access development guideline is intended to reduce project energy use, which is a policy encapsulated within the project's sustainable development envelope. Additionally, the project would provide photovoltaic infrastructure as part of the rooftop shade structures on the upper level of the parking garage. The project would be consistent with the regulations of the Mission Valley PDO.

As illustrated in Table 5.1-4, while many of the recommendations of the San Diego River Park Master Plan do not apply to the proposed project, due to project location, where recommendations are applicable, the project is consistent with these recommendations.

Mitigation Measures

No mitigation is required.

Significance of Impacts Following Implementation of Mitigation Measures

No mitigation is required.

Issue 2

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

Issue 2 addresses the following threshold of significance:

- Substantial incompatibility with an adopted plan.

Impact Analysis

As presented under Issue 1, above, the proposed project is subject to the land use policies contained in the City's General Plan, the Mission Valley Community Plan, and the San Diego River Park Master Plan. The analysis of Issue 1 demonstrates that the proposed project would be consistent with those adopted plans. The proposed project is also subject to the Mission Valley Planned District Ordinance. The proposed project is in conformance with the regulations of the Mission Valley Planned District Ordinance, with the exception of required sidewalk width and landscaped parkways.

LDC Section 1514.0402(b)(1) states that pedestrian sidewalks separated from the street by landscaped parkways shall be provided in relation to the street classification as shown in Table 1514-04A. Section 1514.0402(b)(1) allows the decision maker to permit the widths of the parkway and sidewalk to diminish to accommodate such features as bus stops, transformer boxes, or other site constraints. The project would not meet the requirements of Section 1514.0402(b)(1) for Camino de la Reina, which fronts the project site on the north and west. The project proposes a deviation to this requirement.

Camino de la Reina is classified as a four-lane collector. Table 1514-04A requires an eight-foot wide sidewalk along four-lane collectors, separated from the roadway by a six-foot wide landscape

parkway. The project proposes a 4.5-foot wide contiguous sidewalk along Camino de la Reina and a five- to 5.5-foot parkway adjacent to the sidewalk. Street trees consistent with those proposed in the landscape plan for the Union Tribune project, located immediately west of the project, would be provided within the parkway for design continuity and to create a “Main Street” feel at this gateway to the Mission Valley community.

As a result of portions of the project being located within the floodplain, proposed structures must be raised. Raising the site a minimum of two-feet above the floodplain creates a manufactured slope along Camino de la Reina, transitioning down to the existing sidewalk. The manufactured slope would provide 50 – 61 feet of separation between the public sidewalk and buildings proposed within the project. The existing sidewalk is contiguous to the street.

The project has been designed with a primary focus on the pedestrian and pedestrian access and improving the pedestrian realm. The project proposes amenity features located along the public right-of-way that would provide for pedestrian focus at the project edge. “Nature Walk,” located on the northern and western perimeters of the project site, would provide a landscaped buffer between Camino de la Reina and the project buildings. Within this landscaped area, which additionally acts as a buffer between pedestrians within Nature Walk and Camino de la Reina, Nature Walk would include interpretive signage, a decomposed granite path, and native plants. Nature Walk provides the pedestrian with visual access to the street and the river corridor beyond while removing the pedestrian from the busy street. “The Perch,” located in the northwest corner of the project site, would provide a stepped entry to the main project area with a picnic area and open lawn and play elements, such as bocce ball. The Perch is intended to facilitate active social interaction and activate this corner of the project, which is adjacent to the direct connection leading to the street, Fashion Valley Mall, and Fashion Valley Transit Center. Nature Walk and its decomposed granite path would tie directly in with The Perch. The project’s resultant streetscene will be attractive, and the project’s design features will be inviting to pedestrians and for public gathering.

Strict conformance with the sidewalk and parkway regulations of the Mission Valley PDO would result in the need to create walls along the sidewalk running the entire property along Camino de la Reina in order to raise the project site above the floodplain. The project creates an attractive and inviting street scene, and the reduced sidewalk width does not affect pedestrian access nor detract from public views. Incorporating the project’s design features into the active realm of the pedestrian through the provision of two project amenity areas that connect directly to the public sidewalk results in a more desirable project than would be achieved if the project were to provide sidewalk and parkway widths designed in strict conformance with the regulations of the Mission Valley PDO, which would require that high retaining walls be constructed along the project’s frontage on Camino de la Reina. The project’s proposed deviation to LDC Section 1514.0402(b)(1) would not result in significant environmental impacts.

Significance of Impacts

The proposed project would be consistent with all pertinent policy and development regulations, with the exception of sidewalk design along Camino de la Reina. The project proposes a deviation to these regulations. The proposed deviation would not result in significant environmental impacts. Therefore, no mitigation is required.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts Following Implementation of Mitigation Measures

No mitigation is required.

Issue 3

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

Issue 3 addresses the following thresholds of significance:

- Inconsistency/conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts occur.

Impact Analysis

As stated in *Issue 1*, above, and analyzed in Section 5.7, *Noise*, Dwelling units fronting SR-163 (and I-8) and Camino De La Reina would be exposed to exterior noise levels exceeding 65 dBA CNEL. Project design features would be implemented to comply with the California Building Code, Title 24, Section 1208A requirements for interior noise in habitable rooms and would reduce noise levels to comply with City requirements for interior noise levels. Air conditioning, a form of mechanical ventilation, would be implemented for all on-site dwelling units to ensure that windows can remain closed for prolonged periods of time. Windows with STC ratings higher than those provided by standard building construction (STC-24 to STC-28) would be implemented for bedrooms and living rooms along and directly exposed to traffic on SR-163 and/or Camino De La Reina to comply with the City's requirements for interior noise levels.

Significance of Impacts

Dwelling units fronting SR-163 (and I-8) and Camino De La Reina would be exposed to exterior noise levels exceeding 65 dBA. Project design features would be implemented to comply with the California Building Code, Title 24, Section 1208A requirements for interior noise in habitable rooms and would reduce noise levels to comply with City requirements for interior noise levels. Air conditioning, a form of mechanical ventilation, would be implemented for all on-site dwelling units to ensure that windows can remain closed for prolonged periods of time. Windows with STC ratings higher than those provided by standard building construction (STC-24 to STC-28) would be

implemented for bedrooms and living rooms along and directly exposed to traffic on SR-163 and/or Camino De La Reina to comply with the City's requirements for interior noise levels. The project would result in a less than significant interior noise impact with project features incorporated in accordance with the interior noise analysis.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts Following Implementation of Mitigation Measures

No mitigation is required.



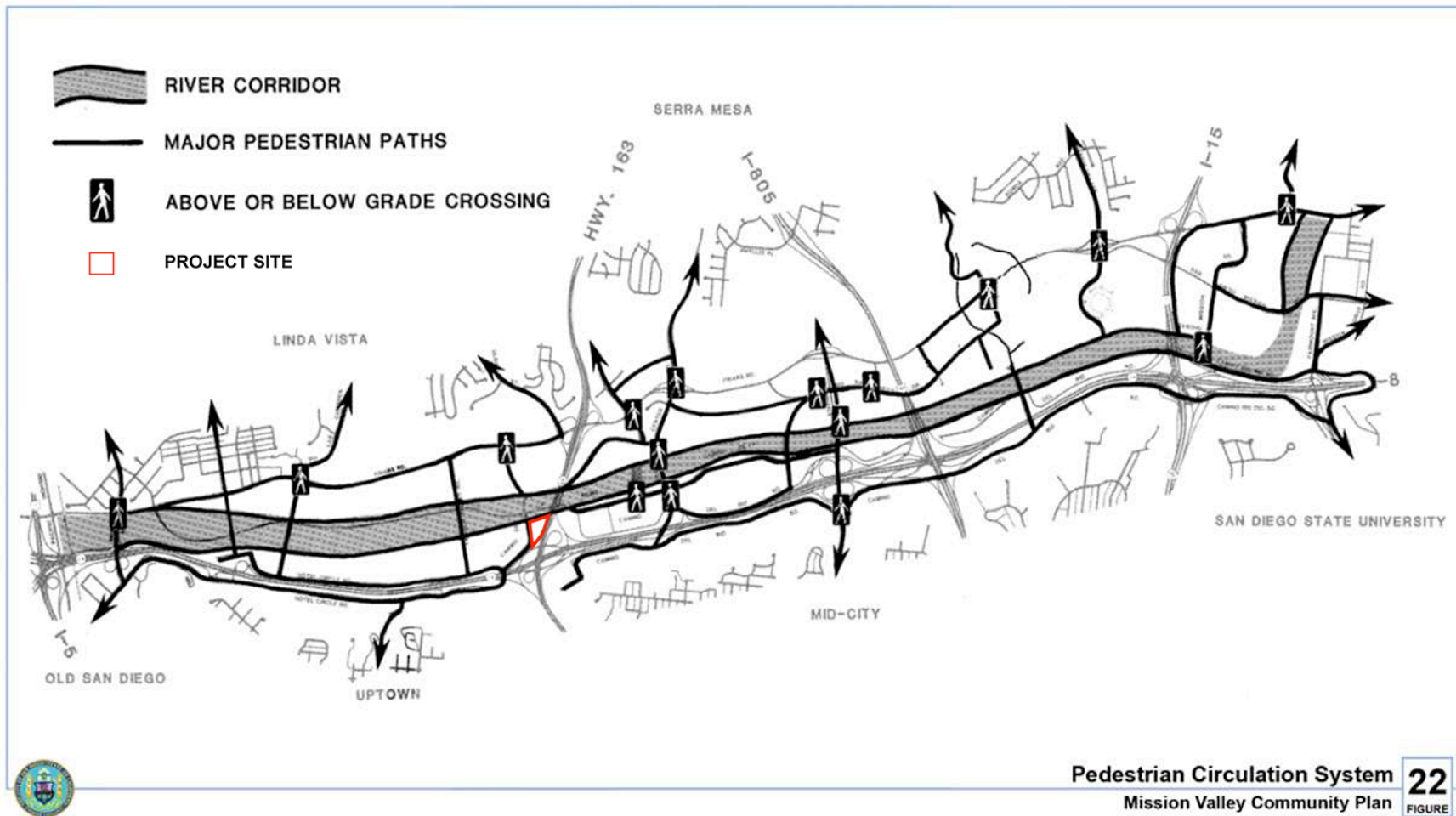


Figure 5.1-2. Mission Valley Community Plan - Pedestrian Circulation System

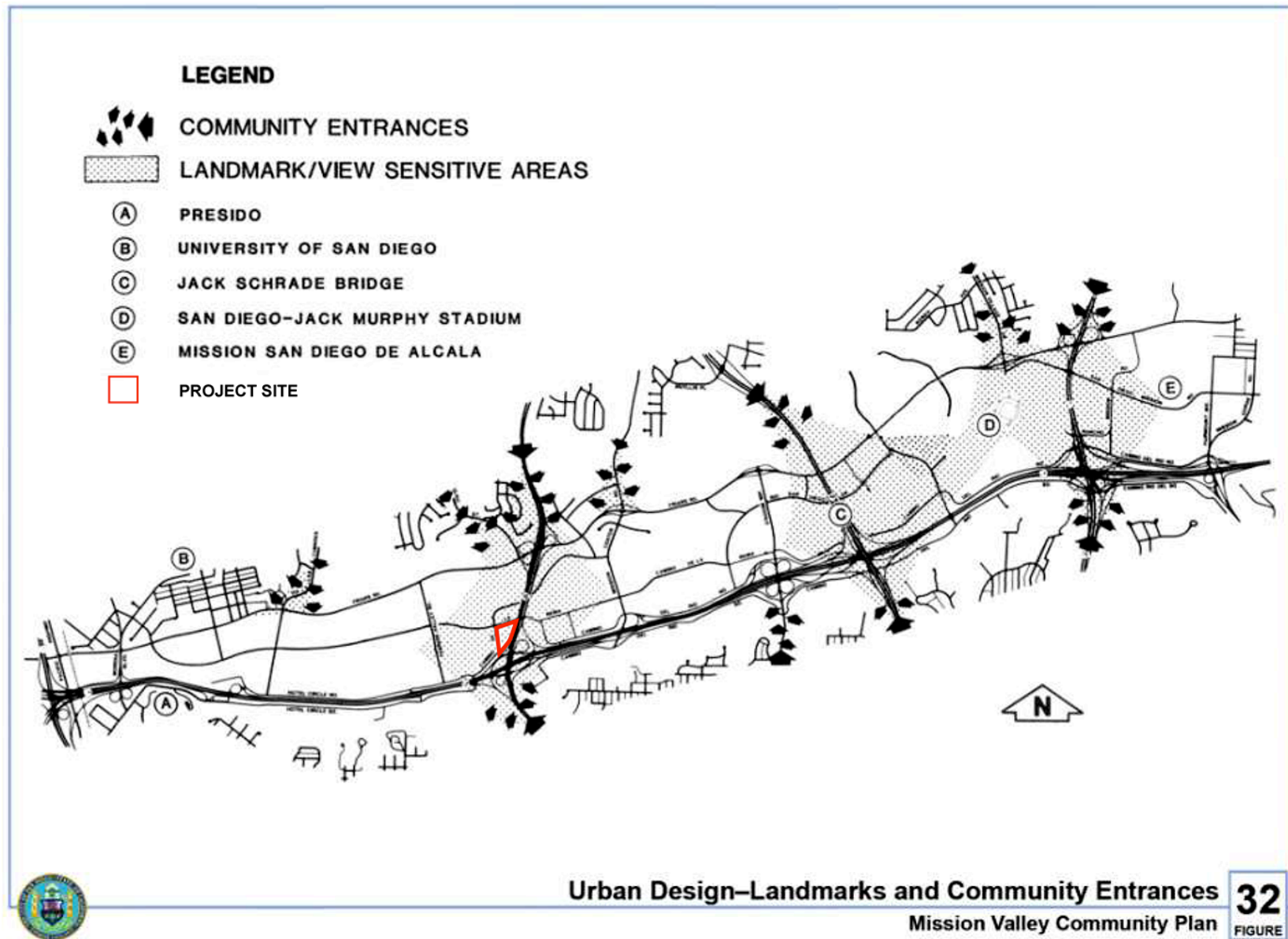


Figure 5.1-3. Mission Valley Community Plan Urban Design – Landmarks and Community Entrances

5.2 Transportation / Traffic Circulation / Parking

This section of the EIR is based on the *Traffic Impact Analysis* prepared for the proposed project by Urban Systems Associates, Inc. (USAI), dated August 31, 2016. A copy of the *Traffic Impact Analysis* is included as Appendix C of this EIR.

The Traffic Impact Analysis (TIA) examines the effects of the proposed Alexan Fashion Valley project on the existing and planned circulation system based on development of the project and build-out of the community. The study area for the proposed project includes existing intersections and their corresponding street segments. The following intersections were analyzed as part of the Traffic Impact Analysis:

- Hotel Circle North and Camino de la Reina
- Camino de la Reina and Driveway 1 (D1 in Figure 5.2-1, *Existing Average Daily Traffic*)
- Camino de la Reina and Driveway 2 (D2 in Figure 5.2-1, *Existing Average Daily Traffic*)
- Camino de la Reina and Avenida del Rio
- Camino de la Reina and Driveway 3 (D3 in Figure 5.2-1, *Existing Average Daily Traffic*)
- Camino del Arroyo and Camino de la Siesta

The following roadway segments were also analyzed as part of the Traffic Impact Analysis:

- Camino de la Reina between Hotel Circle North and Driveway 1
- Camino de la Reina between Driveway 2 and Avenida del Rio
- Camino de la Reina between Driveway 3 and Camino de la Siesta

The Traffic Impact Analysis evaluates existing conditions (based on current street improvements and operations), Existing with Project Conditions, Opening Day (2019) without Project Conditions, Opening Day (2019) with Project Conditions, Horizon Year 2035 Without Project, and Horizon Year 2035 with Project. The term “Opening Day” is meant to discuss a condition occurring after the project’s estimated opening day where traffic from other known development projects in the area expected to be operational between the date of existing counts and the project’s expected opening day in late 2019 is added onto existing traffic levels. This reflects the best information available for determining what traffic would be like at the project’s opening day. The term “Horizon Year 2035” is meant to discuss traffic conditions to the Year 2035. Traffic volumes for the Horizon Year 2035 conditions are based on A SANDAG Series 12 Year 2035 traffic model.

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

5.2.1 Existing Conditions

The project site is located at 123 Camino de la Reina just south of the Fashion Valley Mall and west of SR 163 in the Mission Valley community of the City of San Diego (See Figure 2-2, *Vicinity Map*). The site is developed with 69,651 square feet of office building space and associated surface parking. Provided below is a description of the local roadways, transit, and the bicycle/pedestrian network serving the project site and surrounding area.

EXISTING ROADWAY FACILITIES

Camino de la Reina. Camino de la Reina is an east-west two-lane collector with a two-way left turn lane between Hotel Circle North and Avenida Del Rio. The ultimate classification for Camino de la Reina within the Mission Valley Community Plan is a four-lane major road. On-street parking is not permitted along the project frontage of Camino de la Reina. The posted speed limit is 25 miles per hour. Currently, there are no Class II bike lanes on Camino de la Reina within the study area.

EXISTING TRANSIT

Existing transit is located in the project area. The project site is currently served by bus service provided by Metropolitan Transit Service (MTS). There is a bus stop at the project site along Camino de la Reina. Route 6 travels on Camino de la Reina with stops along the northern project frontage and connects the project site with Mission Valley Center one mile east of the project site, Fashion Valley Transit Center 0.5 miles west of the project site, and the North Park Community south of the project site. The route is active Monday through Friday at approximately 15-minute intervals. The route is also active on Saturdays and Sundays at lesser and varying intervals. Walking distance to the Fashion Valley Transit Center is approximately 0.36 miles; MTS Bus Routes 6, 20, 25, 41, 88, 120, 646, and 928 provide high frequency local bus service with all have stops at the Fashion Valley Transit Center, which provide bus access to other parts of the City and County. Bus Route 41 is a Rapid service bus route, and Route 120 will be transitioned to Rapid service.

The Green Line of the MTS LRT Trolley system stops at the Fashion Valley Transit Center approximately every 15 minutes on weekdays. The route is also active on Saturdays and Sundays at lesser and varying intervals.

EXISTING PEDESTRIAN/BICYCLE NETWORK

Existing sidewalks are provided on the north side of Camino de la Reina, between Hotel Circle and Avenida del Rio, as well as on the south side between Driveway 1 and Avenida del Rio. Existing sidewalks are also available on the west side of Avenida del Rio. Crosswalks are located at the signalized intersection of Camino de la Reina and Avenida del Rio. These crosswalks provide direct access to the MTS bus stop, Fashion Valley Mall, and Transit Center LRT station located at the Fashion Valley Mall Transit Station. No bicycle facilities are provided on Camino de la Reina or Avenida del Rio within the study area.

EXISTING INTERSECTION AND SEGMENT TRAFFIC VOLUMES AND LEVELS OF SERVICE

Traffic counts were taken in February 2015. Figure 5.2-1, *Existing Average Daily Traffic*, shows the existing average weekday 24-hour traffic volumes for street segments in the project study area. Existing street segment functional classifications were used for purposes of the existing traffic volume analysis.

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

While roadway LOS based on daily traffic volumes is useful in describing traffic operating conditions, roadway performance is most often controlled by the performance of intersections and, more specifically, intersection performance during peak traffic periods. Intersection performance is important because traffic control at intersections interrupts traffic flow, which would otherwise be relatively unimpeded (except for the influences of on-street parking, access to adjacent uses or other factors, which result in interaction among vehicles between controlled intersections). As shown in Table 5.2-1, *Existing Street Segment Levels of Service*, all street segments are projected to operate at an acceptable LOS in the existing condition, with the exception of Camino de la Reina between Driveway #3 and Camino de la Siesta, which operates at LOS E.

Table 5.2-1. Existing Street Segment Levels of Service

Road	Segment	Standard	Class.	Cap.	Volume	V/C	LOS
Camino de la Reina	Hotel Circle N. to Driveway 1	SD	2-Ca	15,000	8,886	0.59	C
	Driveway 2 to Avenida del Rio	SD	2-Ca	15,000	8,886	0.59	C
	Driveway 3 to Camino de la Siesta	SD	2-Ca	15,000	13,654	0.91	E
Legend: Class. = Functional Classification Cap. = Capacity LOS = Level of Service 2-Ca = 2 Lane Collector with continuous left turn lane							

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

Table 5.2-2. Existing Intersection Levels of Service

Number	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Hotel Circle N./Camino de la Reina	Signalized	12.0	B	23.4	C
2	Camino de la Reina/Driveway 1	One-Way Stop	10.6	B	14.8	B
3	Camino de la Reina/Driveway 2	Two-Way Stop	10.9	B	13.1	B
4	Camino de la Reina/Avenida del Rio	Signalized	10.8	B	16.9	B
5	Camino de la Reina/Driveway 3	One-Way Stop	9.9	B	17.6	C
6	Camino del la Reina/Camino de la Siesta	Signalized	16.3	B	19.7	B

5.2.2 Impact Analysis

The project would demolish 69,651 square feet of existing office use and construct 284 multi-family residential units, 8,150 square feet of office space and 3,145 square feet of restaurant space. The development is proposed to include multiple access points. The two existing driveways along the west side of the project site (Driveway 1 and 2) would remain where they are located under current conditions, and the existing driveway located on the north side of the project site (Driveway 3) would be relocated to the west. Driveway 1 and Driveway 3 would connect through the on-site fire access lane and provide access to surface parking, as well as the east entrance to the parking structure.

Thresholds of Significance

According to the City's Significance Determination Thresholds, the following significance thresholds apply to the project:

1. If any intersection, roadway segment, or freeway segment affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the thresholds shown in the table below.
2. At any ramp meter location with delays above 15 minutes, the impact would be significant if the project exceeds the thresholds shown in the table below.
3. If a project would add a substantial amount of traffic to a congested freeway segment, interchange, or ramp, the impact may be significant.
4. If a project would increase traffic hazards to motor vehicles, bicyclists or pedestrians due to proposed non-standard design features (e.g., poor sight distance, proposed driveway onto an access-restricted roadway), the impact would be significant.

5. If a project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, the impact would be significant if the proposed roadway would not properly align with other existing or planned roadways.
6. If a project would result in a substantial restriction in access to publicly or privately owned land, the impact would be significant.

Level of Service with Project*	Allowable Change Due To Project Impact**					
	Freeways		Roadway Segments		Intersections	Ramp Metering
	V/C	Speed (mph)	V/C	Speed (mph)	Delay (sec.)	Delay (min.)
E (or ramp meter delays above 15 min.)	0.010	1.0	0.02	1.0	2.0	2.0
F (or ramp meter delayed above 15 min.)	0.005	0.5	0.01	0.5	1.0	1.0

Note 1: The allowable increase in delay at a ramp meter with more than 15 minutes' delay and freeway LOS E is 2 minutes.

Note 2: The allowable increase in delay at a ramp meter with more than 15 minutes' delay and freeway LOS F is 1 minute.

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

** If a proposed project's traffic causes the values shown in the table to be exceeded, the impacts are determined to be significant. The project applicant shall then identify feasible improvements (within the Traffic Impact Study) that will restore/and maintain the traffic facility at an acceptable LOS. If the LOS with the proposed project becomes unacceptable (see above * note), or if the project adds a significant amount of peak-hour trips to cause any traffic queues to exceed on- or off-ramp storage capacities, the project applicant shall be responsible for mitigating the project's direct significant and/or cumulatively considerable traffic impacts.

KEY:

Delay = Average control delay per vehicle measured in seconds for intersections, or minutes for ramp meters

LOS = Level of Service

Speed = measured in miles per hour

V/C = Volume to Capacity ratio

Relative to Parking, parking requirements vary by land use and location and are dictated by the City of San Diego Municipal Code. Non-compliance with the City's parking ordinance does not necessarily constitute a significant environmental impact. However, it can lead to a decrease in the availability of existing public parking in the vicinity of the project. Generally, a significant impact may result if a project is deficient by more than ten percent of the required amount of parking and at least one the following criteria applies:

1. The project's parking shortfall or displacement of existing parking would substantially affect the availability of parking in an adjacent residential area, including the availability of public parking.
2. The parking deficiency would severely impede the accessibility of a public facility, such as a park or beach.

Issue 1

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

Issue 2

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

Issue 3

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

Issue 4

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

Issue 1, Issue 2, Issue 3 and Issue 4 address the following thresholds of significance:

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

Impact Analysis

PROJECT TRIP GENERATION

As shown in Table 5.2-3, *Alexan Fashion Valley Mixed Use Project Trip Generation*, the existing development generates a total of 1,245 ADT. The project is expected to generate 2,119 ADT, with 178 (67 inbound and 110 outbound) morning (AM) peak hour trips and 197 (117 inbound and 71 outbound) afternoon (PM) peak hour trips. Due to the project's proximity to the Fashion Valley Transit Center, a transit and mixed-use reduction has been applied to the Projects trip generation. The existing 69,651 SF office use would be demolished as part of this project and is estimated to generate 1,245 ADT, with 158 AM and 176 PM peak hour trips. After the transit, mixed-use, and existing land use credits are applied, the net new trips generated by the project would be 874 ADT, with 20 (-75 inbound and 95 outbound) AM peak hour trips and 21 (82 inbound and -70 outbound)

PM peak hour trips. The Mission Valley community is well served by transit and has significant pedestrian and bicycle options which have the effect of reducing overall traffic as compared to a typical suburban community.

Table 5.2-3. Alexan Fashion Valley Project Trip Generation

Use	Intensity	Rate	ADT	AM Peak Hour					PM Peak Hour				
				Peak %	Vol.	In%:Out%	In	Out	Peak %	Vol.	In%:Out%	In	Out
Proposed Project													
Multiple Dwelling Units	284 units	6/unit	1,704	8%	136	20%:80%	27	109	9%	153	70%:30%	107	46
Transit Reduction		5%	-85	9%	-12		-2	-10	6%	-9		-6	-3
Mixed Use Reduction		10%	-170	8%	-11		-2	-9	10%	-15		-11	-5
Multi-Tenant Office	8,480 SF	Formula ¹	261	13%	34	90%:10%	31	3	14%	37	20%:80%	7	22
Transit Reduction		3%	-8	5.5%	-2		-2	0	2%	-1		0	-1
Mixed Use Reduction		3%	-8	5%	-2		-2	0	4%	-1		0	-1
High Turnover (sit-down) Restaurant	3,275 SF	130/ KSF	426	8%	34	50%:50%	17	17	8%	34	60%:40%	20	13
Proposed Project SUBTOTAL (with Transit & Mixed-Use Reductions)			2,119		178		67	110		197		117	71
Existing Land Uses													
Multi-Tenant Office	69,651 SF	Formula ¹	1,284	13%	167	90%:10%	150	17	14%	180	20%:80%	36	144
Transit Reduction		3%	-39	5.5%	-9		-8	-1	2%	-4		-1	-3
Existing SUBTOTAL (with Transit Reductions)			1,245		158		142	16		176		35	141
NET NEW TOTAL (Proposed-Existing)			874		20		-75	95		21		82	-70
Source: Trip Rates taken from City of San Diego Trip Generation manual, May 2003 Transit and mixed-use reductions are taken from the City of San Diego Traffic Impact Study Manual, July 1998. Note: ADT = Average Daily Trips KSF = 1,000 square feet 1= Commercial Office ADT calculated from formula taken from City of San Diego Trip Generation Manual, May 2003 (see below) $Ln(Trips) = 0.756 * LN(\text{Commercial Office KSF}) + 3.95$													

PROJECT TRIP DISTRIBUTION AND ASSIGNMENT

Project only trip distribution percentages are shown in Figure 5.2-2, *Project Only Traffic Distribution Percentages*. As shown in Figure 5.2-2, project traffic would distribute 70 percent to the west and 17 percent to the east on Camino de la Reina, while 13 percent travels north towards the Fashion Valley Mall on Avenida del Rio.

Figure 5.2-3, *Project Only Average Daily Traffic*, shows the project only average daily traffic volumes, which are based on the daily net new traffic generation from Table 5.2-3 and distribution of project only traffic from Figure 5.2-2.

EXISTING WITH PROJECT CONDITIONS

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

Street Segments

Street segments' LOS with project traffic was determined by adding expected project only daily volumes to the counted existing daily volumes. Figure 5.2-4, *Existing with Project Average Daily Traffic*, shows the Existing with Project Average Daily Traffic volumes. Table 5.2-4, *Existing with Project Street Segment Levels of Service*, shows street segment LOS with the addition of the project traffic. As shown, Camino de la Reina, between Driveway #3 and Camino de la Siesta, operates at LOS E.

Intersections

Project traffic for the AM and PM peaks was added to existing traffic. Intersection delays and LOS for the Existing with Project peak hour traffic are provided in Table 5.2-5, *Existing with Project Intersection Levels of Service*. As shown, no intersections within the study area are projected to operate at unacceptable LOS under existing conditions.

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

Road	Segment	Standard	Class.	Cap.	Volume	V/C	LOS
Camino de la Reina	Hotel Circle N. to Driveway 1	SD	2-Ca	15,000	9,498	0.63	C
	Driveway 2 to Avenida del Rio	SD	2-Ca	15,000	9,061	0.60	C
	Driveway 3 to Camino de la Siesta	SD	2-Ca	15,000	13,803	0.92	E
Legend: Class. = Functional Classification Cap. = Capacity LOS = Level of Service 2-Ca = 2 Lane Collector (with continuous left turn lane)							

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

Number	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Hotel Circle N./Camino de la Reina	Signalized	12.6	B	26.4	C
2	Camino de la Reina/Driveway 1	One-Way Stop	11.2	B	13.9	B
3	Camino de la Reina/Driveway 2	Two-Way Stop	11.1	B	14.1	B
4	Camino de la Reina/Avenida del Rio	Signalized	11.5	B	17.1	B
5	Camino de la Reina/ Driveway 3	One-Way Stop	9.6	A	17.5	C
6	Camino de la Reina/Camino de la Siesta	Signalized	16.5	B	20.1	C
Notes: Delay = Second per Vehicle LOS = Level of Service						

OTHER PROJECTS

To determine the Opening Day without Project traffic volumes, USAI researched other projects and contacted City staff to determine other proposed or approved projects that are expected to have impacts within the project study area. The "other projects" were added to existing traffic in order to

determine “cumulative impacts” as required by CEQA. According to CEQA, a list of “past, present and probable future projects” should be used to determine cumulative project conditions. For purposes of this analysis, the Alexan Fashion Valley project anticipated opening day to be Year 2019. Any “other projects” expected to be completed and occupied prior to the “Opening Day” were included in the “Opening Day” scenario. The full list of “other projects” included and considered in the Opening Day analysis. Full buildout will not occur until after early 2016. These projects are listed in Table 5.2-6, *Other Projects List*.

Table 5.2-6. Other Projects List

Projects Included in Opening Day (2018) Analysis					
#	Project	Land Use		ADT	Status
1	Union Tribune Mixed Use	200 units 3,000 SF	Multi-Family Residential Service Retail	1,128	Approved
2	Camino del Rio Mixed Use	305 units 5,000 SF 4,000 SF	Multi-Family Residential Multi-Tenant Office Retail	1,830 175 160	Approved
3	Riverwalk ⁽³⁾ (Phase 1)	3,000 Units 170,000 SF	Residential Commercial/Retail	18,000 8,330	Not yet submitted but included in study
4	Legacy International Center	127 Rooms	Timeshare Religious Facility	1,805	Pending
5	Town and Country	840 units	Multi-Family Residential	210	Pending
Projects Considered but Not Included in Opening Day (2018) Analysis ⁽¹⁾					
6	Residence Inn	118 rooms	Motel	1,062	Considered
7	Lankford Medical Office	92,400 SF	Medical Office	1,848	Considered
8	Discovery Place	111 rooms 1,500 SF 6,000 SF	Hotel Fast Food Commercial/Retail	999 756 216	Considered
9	Holiday Inn Express ⁽²⁾	92 rooms	Hotel	394	Considered
10	Civita- Quarry Falls ⁽⁴⁾ (Phase 1)	2,477 units 50,000 SF 50,000 SF	Residential Community Commercial Neighborhood Commercial	17,450	Considered
11	Hazard Center	473 units 2,205 SF	Multi-dwelling units Commercial/Retail	950	Considered
Notes: (1)= These projects are either built or traffic from these projects are outside the study area for the proposed project. (2)= The Holiday Inn Express was constructed and occupied in May 2015. Since the traffic counts were conducted prior to May 2015, this project was considered as an “other” project. However, Holiday Inn Express traffic is minimal and would not be expected to impact the Alexan Fashion Valley study area. (3)= As of March 2016, the Riverwalk Master Plan (Levi-Cushman Specific Plan) has not been submitted to the City of San Diego. However, the Opening Day (2018) analysis assumes 3,000 dwelling units and 170,000 SF of commercial retail generating 26,330 ADT to be conservative. (4)= As of March 2016, the Quarry Falls-Civita development has built approximately 1,500 dwelling units which is lower than the 2,477 dwelling units and 100,000 SF of commercial generating 17,450 ADT. The Opening Day (2018) considered, but did not include any traffic from Civita since it would not be expected to impact the Alexan Fashion Valley study area. Legend: SF = square feet DU = dwelling unit ADT = Average Daily Traffic					

OPENING DAY (2019) WITHOUT PROJECT

In order to determine Opening Day traffic, an examination of the immediate area surrounding the project, including those that were approved, pending approval, or planned in the area and assumed to be constructed prior to the project’s anticipated Opening Day in Year 2019 was conducted. The

project only traffic from other projects was added to the existing traffic to reflect an “existing plus other project” or Opening Day scenario. No road network changes were assumed for this condition compared to the existing condition.

Street Segments

Average daily traffic volumes from the other projects expected to be completed prior to the project's opening day added to existing average daily traffic volumes are shown in Figure 5.2-6, *Opening Day without Project Average Daily Traffic*. Table 5.2-7, *Opening Day without Project Street Segment Levels of Service*, shows street segment LOS without project traffic. As shown, Camino de la Reina, between Driveway 3 to Camino de la Siesta, is projected to operate at LOS F.

Table 5.2-7. Opening Day (2019) without Project Street Segment Levels of Service

Road	Segment	Standard	Class.	Cap.	Volume	V/C	LOS
Camino de la Reina	Hotel Circle N. to Driveway 1	SD	2-Ca	15,000	10,536	0.70	D
	Driveway 2 to Avenida de Rio	SD	2-Ca	15,000	10,086	0.67	D
	Driveway 3 to Camino de la Siesta	SD	2-Ca	15,000	16,303	1.09	F
Legend: Class. = Functional Classification Cap. = Capacity LOS = Level of Service 2-Ca = 2 Lane Collector (with continuous left-turn lane)							

Intersections

The peak hour traffic volumes from the “other projects” expected to be completed prior to the project's Opening Day in late 2019 are shown in Table 5.2-8, *Opening Day without Project Intersection Levels of Service*. As shown in Table 5.2-8, all intersections evaluated are expected to operate at an acceptable LOS.

Table 5.2-8. Opening Day (2019) without Project Intersection Levels of Service

Number	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Hotel Circle N./Camino de la Reina	Signalized	13.7	B	32.3	C
2	Camino de la Reina/Driveway 1	One-Way Stop	11.1	B	16.2	C
3	Camino de la Reina/Driveway 2	Two-Way Stop	11.7	B	14.7	B
4	Camino de la Reina/Avenida del Rio	Signalized	14.8	B	17.8	B
5	Camino de la Reina/Driveway 3	One-Way Stop	11.0	B	20.5	C
6	Camino de la Reina/Camino de la Siesta	Signalized	17.1	B	21.9	C
Notes: Delay = Second per Vehicle LOS = Level of Service						

OPENING DAY (2019) WITH PROJECT

This section evaluates the Opening Day (2019) with Project traffic conditions by adding the “other projects” expected to be completed prior to the project’s opening day in Year 2019 plus project traffic to existing volumes. These traffic volumes are then used to evaluate project traffic impacts. No road network changes were assumed for this condition compared to the existing condition.

Street Segments

Average daily traffic volumes with project traffic added to existing plus other projects which are expected to be completed prior to the project’s opening day, are shown in Figure 5.2-7, *Opening Day (2019) with Project Average Daily Traffic*. Table 5.2-9, *Opening Day with Project Street Segment Levels of Service*, shows street segment levels of service with project traffic. As shown in Table 5.2-9, Camino de la Reina, between Driveway 3 to Camino de la Siesta, is projected to operate at LOS F.

Table 5.2-9. Opening Day with Project Street Segment Levels of Service

Road	Segment	Standard	Class.	Cap.	Volume	V/C	LOS
Camino de la Reina	Hotel Circle N. to Driveway 1	SD	2-Ca	15,000	11,148	0.74	D
	Driveway 2 to Avenida del Rio	SD	2-Ca	15,000	10,261	0.68	D
	Driveway 3 to Camino de la Siesta	SD	2-Ca	15,000	16,452	1.10	F
Legend: Class. = Functional Classification Cap. = Capacity LOS = Level of Service 2-Ca = 2 Lane Collector (with continuous left-turn lane)							

Intersections

Existing plus other projects expected to be completed by opening day plus project combined traffic volumes during AM/PM peak hours at study area intersections are shown in Table 5.2-10, *Opening Day with Project Intersection Levels of Service*. As shown in Table 5.2-10, all intersections are projected to operate at acceptable levels of service.

Table 5.2-10. Opening Day with Project Intersection Levels of Service

Number	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Hotel Circle N./Camino de la Reina	Signalized	14.4	B	35.1	D
2	Camino de la Reina/Driveway 1	One-Way Stop	11.8	B	14.9	B
3	Camino de la Reina/Driveway 2	Two-Way Stop	12	B	16.2	C
4	Camino de la Reina/Avenida del Rio	Signalized	15.5	B	17.6	B
5	Camino de la Reina/Driveway 3	One-Way Stop	10.9	B	20.3	C
6	Camino de la Reina/Camino de la Siesta	Signalized	17.3	B	21.5	C
Notes: Delay=Second per Vehicle LOS= Level of Service						

HORIZON YEAR 2035 WITHOUT PROJECT

Horizon Year 2035 Without Project traffic volumes for the Alexan Fashion Valley project are based on a SANDAG Series 12 Regional Traffic Model. Within the study area for the Alexan Fashion Valley project, the following planned improvements were assumed in the Year 2035 scenarios:

- Via Las Cumbres Extension – Via Las Cumbres is assumed to be constructed from Friars Road to Hotel Circle North.
- Hazard Center Drive Extension – Hazard Center Road is assumed to be extended under SR-163 to connect to Riverwalk Drive as a two-lane facility.

As discussed in the Opening Day scenarios, no road network changes were assumed for this condition compared to the existing condition.

Street Segments

Average daily traffic volumes from the Horizon Year 2035 Without Project Scenario are shown in Figure 5.2-8, *Horizon Year 2035 without Project Average Daily Traffic*. Table 5.2-11, *Horizon Year 2035 without Project Street Segment Levels of Service*, shows street segment LOS without project traffic. As shown in the table, all three study segments on Camino de la Reina operate at unacceptable levels of service "F".

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

Road	Segment	Standard	Class.	Cap.	Volume	V/C	LOS
Camino de la Reina	Hotel Circle N. to Driveway 1	SD	2-Ca	15,000	16,460	1.10	F
	Driveway 2 to Avenida del Rio	SD	2-Ca	15,000	18,330	1.22	F
	Driveway 3 to Camino de la Siesta	SD	2-Ca	15,000	18,520	1.23	F
<p><u>Legend:</u></p> <p>Class. = Functional Classification Cap. = Capacity LOS = Level of Service 2-Ca = 2 Lane Collector (with continuous left-turn lane)</p>							

Intersections

The peak hour traffic volumes from Horizon 2035 Without Project Scenario at study area intersections. Table 5.2-12, *Horizon Year 2035 without Project Intersection Levels of Service*, shows resulting AM and PM peak hour LOS. As shown in Table 5.2-12, all intersections evaluated are expected to operate at an acceptable LOS.

Table 5.2-12. Horizon Year 2035 without Project Intersection Levels of Service

Number	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Hotel Circle N./Camino de la Reina	Signalized	17.5	B	47.1	D
2	Camino de la Reina/Driveway 1	One-Way Stop	12.2	B	20.2	C
3	Camino de la Reina/Driveway 2	Two-Way Stop	14.1	B	22.6	C
4	Camino de la Reina/Avenida del Rio	Signalized	16.1	B	26.2	C
5	Camino de la Reina/Driveway 3	One-Way Stop	11.4	B	34.4	D
6	Camino de la Reina/Camino de la Siesta	Signalized	19.3	B	48.3	D
Notes: Delay=Seconds per Vehicle LOS= Level of Service						

HORIZON YEAR 2035 WITH PROJECT

Community Plan Consistency

The Alexan Fashion Valley project is expected to generate up to 1,863 ADT. The Mission Valley community is governed by a MVPDO which limits development intensity. According to the MVPDO (§1514.0301 (c) (1)), "Development intensity shall be limited by the number of average daily trips (ADT) generated by the existing and proposed land uses of any development proposal." The project is located in Development Intensity District (DID) C. According to Table 1514-03A in the MVPDO, up to 417 ADT per gross acre is allowed within DID C under development Threshold 2. The Community Plan would allow up to 2,050 ADT for the 4.92-acre project site within the allowable development thresholds.

Therefore, the proposed project is expected to generate fewer average daily trips than allowed under Threshold 2 and would be consistent with the Community Plan. Table 5.2-13 shows the Development Intensity Districts and respective Thresholds.

Table 5.2-13. Mission Valley Development Intensity District Thresholds

Trips Per Gross Acre		
District	Threshold 1	Threshold 2
A	150 ⁽¹⁾	338 ⁽¹⁾
B	150	263
C	150 ⁽¹⁾	417 ⁽¹⁾
D	200 ⁽¹⁾	380 ⁽¹⁾
E	140 ⁽¹⁾	353 ⁽¹⁾
F	140 ⁽¹⁾	140 ⁽¹⁾
G	140	344
H	140	323
I	140	571
J	200 ⁽¹⁾	671 ⁽¹⁾
K	200 ⁽¹⁾	424 ⁽¹⁾
L	140	267
M	140	157

¹ Excluding acreage within steep hillsides

Source: Mission Valley Planned District Ordinance

Street Segments

Horizon Year 2035 with project traffic added volumes are shown in Figure 5.2-9, *Horizon Year 2035 with Project Average Daily Traffic*. Table 5.2-14, *Horizon Year 2035 with Project Street Segment Levels of Service*, shows street segment levels of service with project traffic. As shown in Table 5.2-14, all three study segments on Camino de la Reina operate at unacceptable levels of service "F".

Table 5.2-14. Horizon Year 2035 with Project Street Segment Levels of Service

Road	Segment	# of Ln.	Class.	Cap.	Volume	V/C	LOS
Camino de la Reina	Hotel Circle N. to Driveway 1	SD	2-Ca	15,000	17,072	1.14	F
	Driveway 2 to Avenida del Rio	SD	2-Ca	15,000	18,505	1.23	F
	Driveway 3 to Camino de la Siesta	SD	2-Ca	15,000	18,659	1.24	F
Legend: Class. = Functional Classification Cap. = Capacity LOS = Level of Service 2-Ca = 2 Lane Collector with continuous left turn lane							

Intersections

Expected peak hour volumes at Horizon Year 2035 with Project for the intersections analyzed are shown in Figure 5.2-9. Table 5.2-15, *Horizon Year 2035 with Project Intersection Levels of Service* shows the AM and PM peak hour LOS for the Horizon Year 2035 with Project condition. As shown in Table 5.2-15, all intersections are projected to operate at acceptable levels of service in both AM and PM peak hour.

Table 5.2-15. Horizon Year 2035 with Project Intersection Levels of Service

Number	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Hotel Circle N./Camino de la Reina	Signalized	17.8	B	50.7	D
2	Camino de la Reina/Driveway 1	One-Way Stop	13.2	B	17.8	C
3	Camino de la Reina/Driveway 2	Two-Way Stop	14.6	B	26.1	D
4	Camino de la Reina/Avenida del Rio	Signalized	16.2	B	26.1	C
5	Camino de la Reina/Driveway 3	One-Way Stop	11.1	B	33.5	D
6	Camino de la Reina/Camino de la Siesta	Signalized	19.6	B	46.4	D
Notes: Delay=Seconds per Vehicle LOS= Level of Service						

Summary of Impacts

As show in Tables 5.2-16 (*Existing with and without Project Street Segment Significance*), 5.2-17 (*Opening Day (2019) with and without Project Street Segment Significance*), and 5.2-18 (*Horizon Year 2035 with and without Project Street Segment Significance*), the proposed project would result in the following significant traffic impacts for the street segment of Camino de la Reina as summarized below:

Impact 5.2-1 **The proposed project would result in a cumulatively significant impact at the segment of Camino de la Reina between Hotel Circle North and Driveway 1 under the Horizon Year plus Project conditions.**

Impact 5.2-2 **The proposed project would result in a cumulatively significant impact at the segment of Camino de la Reina between Driveway 2 and Avenida del Rio under the Horizon Year plus Project conditions.**

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

Significance of Impacts

The proposed project would not result in any significant direct impacts to existing or planned transportation systems or result in traffic generation in excess of specific community plan allocation. The proposed project would also not result in any significant direct impacts to a congested freeway segment, interchange or ramp or to the existing traffic load and capacity of the street system. However, it would result in two significant Horizon Year (2035) cumulative impacts on Camino de la Reina from Hotel Circle North to Driveway 1 and Camino de la Reina from Driveway 2 to Avenida del Rio.

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

Road	Segment	LOS "E" Capacity	Class.	Existing			Existing + Project			Δ V/C	Is this impact Significant?
				LOS	Volume	V/C	LOS	Volume	V/C		
Camino de la Reina	Hotel Circle N. to Driveway 1	15,000	2-Ca	C	8,886	0.59	C	9,498	0.63	0.042	NO
	Driveway 2 to Avenida Del Rio	15,000	2-Ca	C	8,886	0.59	C	9,061	0.60	0.011	NO
	Driveway 3 to Camino de la Siesta	15,000	2-Ca	E	13,654	0.91	E	13,803	0.92	0.010	NO

Table 5.2-17. Opening Day (2019) with and without Project Street Segment Significance

Road	Segment	LOS "E" Capacity	Class.	Opening Day (2019)			Opening Day (2018) with Project			Δ V/C	Is this impact Significant?
				LOS	Volume	V/C	LOS	Volume	V/C		
Camino de la Reina	Hotel Circle N. to Driveway 1	15,000	2-Ca	D	10,536	0.70	D	11,148	0.74	0.041	NO
	Driveway 2 to Avenida Del Rio	15,000	2-Ca	D	10,086	0.67	D	10,261	0.68	0.012	NO
	Driveway 3 to Camino de la Siesta	15,000	2-Ca	F	16,303	1.09	F	16,452	1.10	0.010	NO

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

Road	Segment	LOS "E" Capacity	Class.	Opening Day (2019)			Opening Day (2018) with Project			Δ V/C	Is this impact Significant?
				LOS	Volume	V/C	LOS	Volume	V/C		
Camino de la Reina	Hotel Circle N. to Driveway 1	15,000	2-Ca	F	16,460	1.10	F	17,072	1.14	0.041	YES
	Driveway 2 to Avenida Del Rio	15,000	2-Ca	F	18,330	1.22	F	18,505	1.23	0.012	YES
	Driveway 3 to Camino de la Siesta	15,000	2-Ca	F	18,250	1.23	F	18,669	1.24	0.010	NO

Table 5.2-19. Existing with and without Project Intersection Summary

Intersection	Existing				Existing + Project							
	AM Peak Hour		PM Peak Hour		AM Peak Hour		Δ	S?	PM Peak Hour		Δ	S?
	D	LOS	D	LOS	D	LOS			D	LOS		
Hotel Circle N./Camino de la Reina	12.0	B	23.4	C	12.6	B	0.6	No	26.4	C	3.0	No
Camino de la Reina/Driveway 1	10.6	B	14.8	B	11.2	B	0.6	No	13.9	B	-0.9	No
Camino de la Reina/Driveway 2	10.9	B	13.1	B	11.1	B	0.2	No	14.1	B	1.0	No
Camino de la Reina/Avenida del Rio	10.8	B	16.9	B	11.5	B	0.7	No	17.1	B	0.2	No
Camino de la Reina/Driveway 3	9.9	A	17.6	C	9.6	A	-0.3	No	17.5	C	-0.1	No
Camino de la Reina/Camino de la Siesta	16.3	B	19.7	B	16.5	B	0.2	No	20.1	C	0.4	No
Notes:												
LOS = Level of Service												
Δ = Change												
S = Significant												
D = Delay												

Table 5.2-20. Opening Day (2019) with and without Project Intersection Summary

Intersection	Opening Day (2019)				Opening Day (2019) + Project							
	AM Peak Hour		PM Peak Hour		AM Peak Hour		Δ	S?	PM Peak Hour		Δ	S?
	D	LOS	D	LOS	D	LOS			D	LOS		
Hotel Circle N./Camino de la Reina	13.7	B	32.3	C	14.4	B	0.7	No	35.1	D	2.8	No
Camino de la Reina/Driveway 1	11.1	B	16.2	C	11.8	B	0.7	No	14.9	B	-1.3	No
Camino de la Reina/Driveway 2	11.7	B	14.7	B	12.0	B	0.3	No	16.2	C	1.5	No
Camino de la Reina/Avenida del Rio	14.8	B	17.8	B	15.5	B	0.7	No	17.6	B	-0.2	No
Camino de la Reina/Driveway 3	11.0	B	20.5	C	10.9	B	-0.1	No	20.3	C	-0.2	No
Camino de la Reina/Camino de la Siesta	17.1	B	21.9	C	17.3	B	0.2	No	21.5	C	-0.4	No
Notes:												
LOS = Level of Service												
Δ = Change												
S = Significant												
D = Delay												

Table 5.2-21. Horizon Year 2035 with and without Project Intersection Summary

Intersection	Horizon Year 2035				Horizon Year 2035 + Project							
	AM Peak Hour		PM Peak Hour		AM Peak Hour		Δ	S?	PM Peak Hour		Δ	S?
	D	LOS	D	LOS	D	LOS			D	LOS		
Hotel Circle N./Camino de la Reina	17.5	B	47.1	D	17.8	B	0.3	No	50.7	D	3.6	No
Camino de la Reina/Driveway 1	12.2	B	20.2	C	13.2	B	1.0	No	17.8	C	-2.4	No
Camino de la Reina/Driveway 2	14.1	B	22.6	C	14.6	B	0.5	No	26.1	D	3.5	No
Camino de la Reina/Avenida del Rio	16.1	B	26.2	C	16.2	B	0.1	No	26.1	C	-0.1	No
Camino de la Reina/Driveway 3	11.4	B	34.4	D	11.1	B	-0.3	No	33.5	D	-0.9	No
Camino de la Reina/Camino de la Siesta	19.3	B	48.3	D	19.6	B	0.3	No	46.4	D	-1.9	No
Notes: LOS = Level of Service Δ = Change S = Significant D = Delay												

Mitigation Measures

The following mitigation measures would be implemented to reduce the project's impacts to traffic and circulation to below a level of significance:

- MM 5.2-1 Camino de la Reina: Hotel Circle North to Driveway 1 (Impact 5.2-1)** - Widening this segment to a three-lane Collector standard (providing half-width of a four-lane Major roadway) would mitigate the project's significant impact. The Alexan Fashion Valley project proposes to provide an IOD and DIA for the widening of Camino De La Reina along the project frontage. In addition, the project would be responsible for restriping the project frontage following widening (to account for appropriate transitions) of Camino De La Reina to three-lane Collector standards between Driveway 1 and Hotel Circle. Provisions of the IOD, DIA, and restriping would mitigate the cumulative impact along this segment.
- MM 5.2-2 Camino de la Reina: Driveway 2 to Avenida del Rio (Impact 5.2-2)** - Widening this segment to three-lane Collector standard (providing half-width of a four-lane Major roadway) would mitigate the project's significant impact. The Alexan Fashion Valley project proposes to provide an IOD and DIA for the widening of Camino De La Reina along the project frontage. In addition, the project would be responsible for restriping the project frontage following widening (to account for appropriate transitions) of Camino De La Reina to three-lane Collector standard between Driveway 1 and Hotel Circle. Provisions of the IOD, DIA, and restriping would mitigate the cumulative impact along this segment.

Significance of Impacts Following Implementation of Mitigation Measures

Following implementation of Mitigation Measures MM 5.2-1 and MM 5.2-2, above, the project's cumulative impacts to street segments would be mitigated to below a level of significance.

Issue 5

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

Issue 5 addresses the following thresholds:

Generally, if a project is deficient by more than ten percent of the required amount of parking and at least one the following criteria applies, then a significant impact may result:

1. The project's parking shortfall or displacement of existing parking would substantially affect the availability of parking in an adjacent residential area, including the availability of public parking.
2. The parking deficiency would severely impede the accessibility of a public facility, such as a park or beach.

Impact Analysis

Parking for the Alexan Fashion Valley project is planned to be accommodated wholly on-site. A six-story parking structure accessed off of Camino de la Reina with a total of 404 spaces is proposed. The remaining parking will be accommodated by 65 surface parking spaces. Parking required per the SDMC is 468 spaces. Therefore, the project meets the required minimum amount of parking. No impacts associated with parking would result.

There is no street parking allowed along the sections of Camino de la Reina that border the project site. The proposed project would not displace off-site parking, nor would the proposed project increase the demand for off-site parking, as off-site parking is not allowed.

Significance of Impacts

The project would not result in significant impacts associated with existing parking or an increased demand for off-site parking.

Mitigation Measures

No impacts associated with parking are anticipated. Therefore, no mitigation measures are required.

Significance of Impacts Following Implementation of Mitigation Measures

No impacts associated with parking are anticipated. Therefore, no mitigation measures are required.

Issue 6

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

Issue 6 addresses the following threshold of significance:

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

Impact Analysis

The project proposes to alter existing traffic patterns in the immediate vicinity of the project site. The development is proposed to include multiple access points. The two existing driveways along the west side of the project site (Driveway 1 and 2) would remain, and the existing driveway located on the north side of the project site (Driveway 3) would be relocated approximately 200 feet west. Driveway 1 and Driveway 3 would connect and provide access to surface parking, as well as the east entrance to the parking structure.

As mitigation for the project's cumulative impacts to two segments of Camino de la Reina, between Hotel Circle North and Driveway 1 and Driveway 2 to Avenida del Rio, the project would provide an IOD and DIA for the widening of Camino de la Reina along the project frontage. In addition, the project also proposes to contribute a fair share towards restriping with potential widening of Camino de la Reina to three-lane Collector standards between Driveway 1 and Hotel Circle.

The project does not propose major changes to existing circulation within the community or region. The project proposes no hazardous design features, such as sharp curves or dangerous intersections. Uses within the proposed project and adjacent community are compatible. Pedestrian circulation has been designed so as to minimize potential conflicts. Additionally, the project site is located adjacent to existing residential, office and commercial development to the east. The uses proposed within the Alexan Fashion Valley project are compatible with adjacent development.

Significance of Impacts

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

Mitigation Measures

The proposed project would result in a change in traffic patterns in the immediate vicinity of the project site. However, no significant impacts would result from that change. No mitigation measures are required.

Significance of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

Issue 7

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

Impact Analysis

As a condition of project approval, a Transportation Demand Management (TDM) would be incorporated. A TDM is a strategy designed to reduce single occupant vehicle trips during the AM and PM peak weekday hours. Since most commuting and congestion occur during weekday peak periods, TDM seeks to shift commuters to transportation modes other than cars as well as reduce peak hour trips by encouraging commuting in non-peak periods and other strategies. The Alexan Fashion Valley project will incorporate TDM measures including the following:

- Kiosks or bulletin boards in central locations, which encourage alternative modes of transportation
- Informational newsletters to residents, tenants and employees discussing iCommute ~~Ride-Link~~ and other tools for carpooling, bicycling, and alternative modes of transportation.
- Designated carpool coordinator for the residents
- Bicycle parking in central locations
- Preferred parking for fuel efficient vehicles

The project site is walking distance to Fashion Valley Transit Center, approximately 0.36 miles. MTS Bus Routes 6, 20, 25, 41, 88, 120, 646, and 928 provide high frequency local bus service and, in the case of Route 41, Rapid bus service. ~~all~~ All of these routes have stops at the Fashion Valley Transit Center. Additionally, the Green Line of the MTS Trolley System stops at the Fashion Valley Transit Center. The project site is served by bus MTS Bus Route 6 which travels on Camino De La Reina, with stops along the northern project frontage, and connects the project site with Mission Valley Center, the Fashion Valley Transit Center, and the North Park community. Transit is fully operable and funded in the project area. This transit service would remain following implementation of the proposed project. Development of the Alexan Fashion Valley project would not impact local transit access.

Pedestrian access would be provided through sidewalks on Camino de la Reina and Avenida del Rio. From the proposed project, pedestrians can utilize these sidewalks to reach the rest of the community. No bicycle facilities are provided on Camino de la Reina or Avenida del Rio. The proposed project would provide a total of 150 bicycle parking spaces (132 residential, eight

commercial long term, and ten commercial short term). Per the SDMC the project is required to provide 129 bicycle parking spaces. No impacts would result.

Significance of Impacts

The proposed project would not conflict with adopted policies, plans or programs supporting alternative transportation models. No impacts would result.

Mitigation Measures

The proposed project would not conflict with adopted policies, plans or programs supporting alternative transportation models no mitigation would be required.

Significance of Impacts Following Implementation of Mitigation Measures

The proposed project would not conflict with adopted policies, plans or programs supporting alternative transportation models no mitigation would be required.

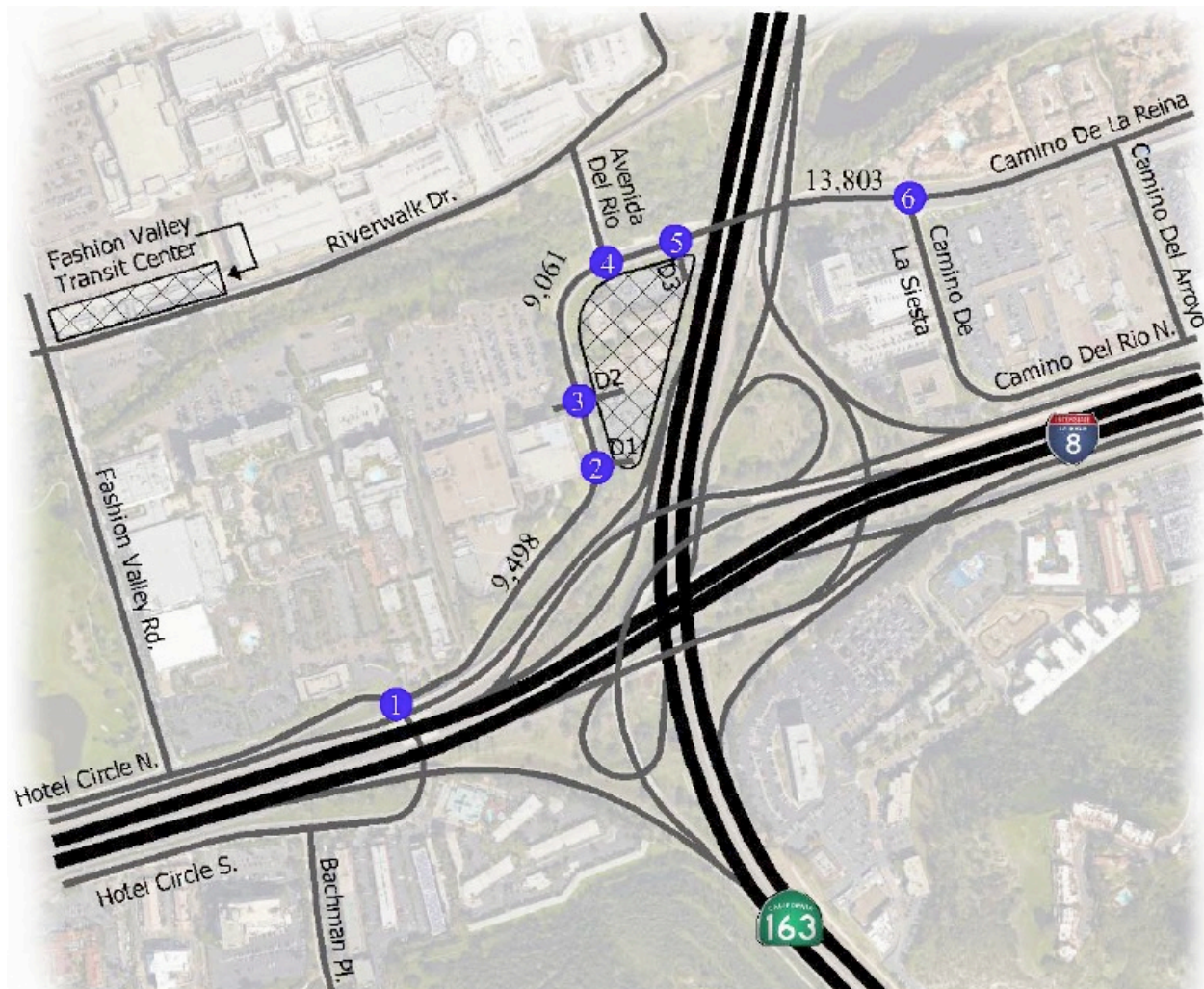


Figure 5.2-1. Existing Average Daily Traffic



Figure 5.2-2. Project Only Traffic Distribution



Figure 5.2-3. Project Only Average Daily Traffic



Figure 5.2-4. Existing with Project Average Daily Traffic

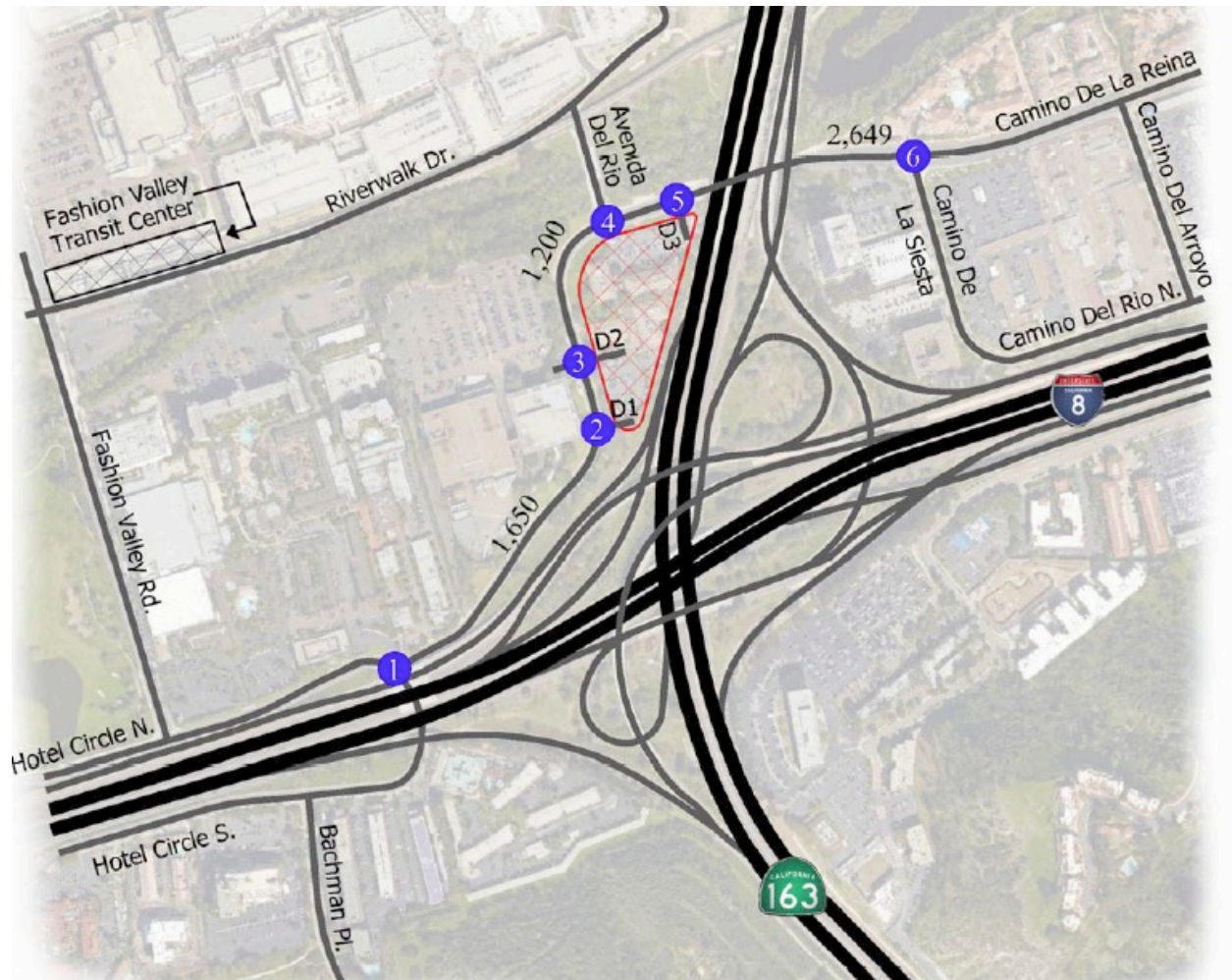


Figure 5.2-5. Opening Day Other Projects Average Daily Traffic

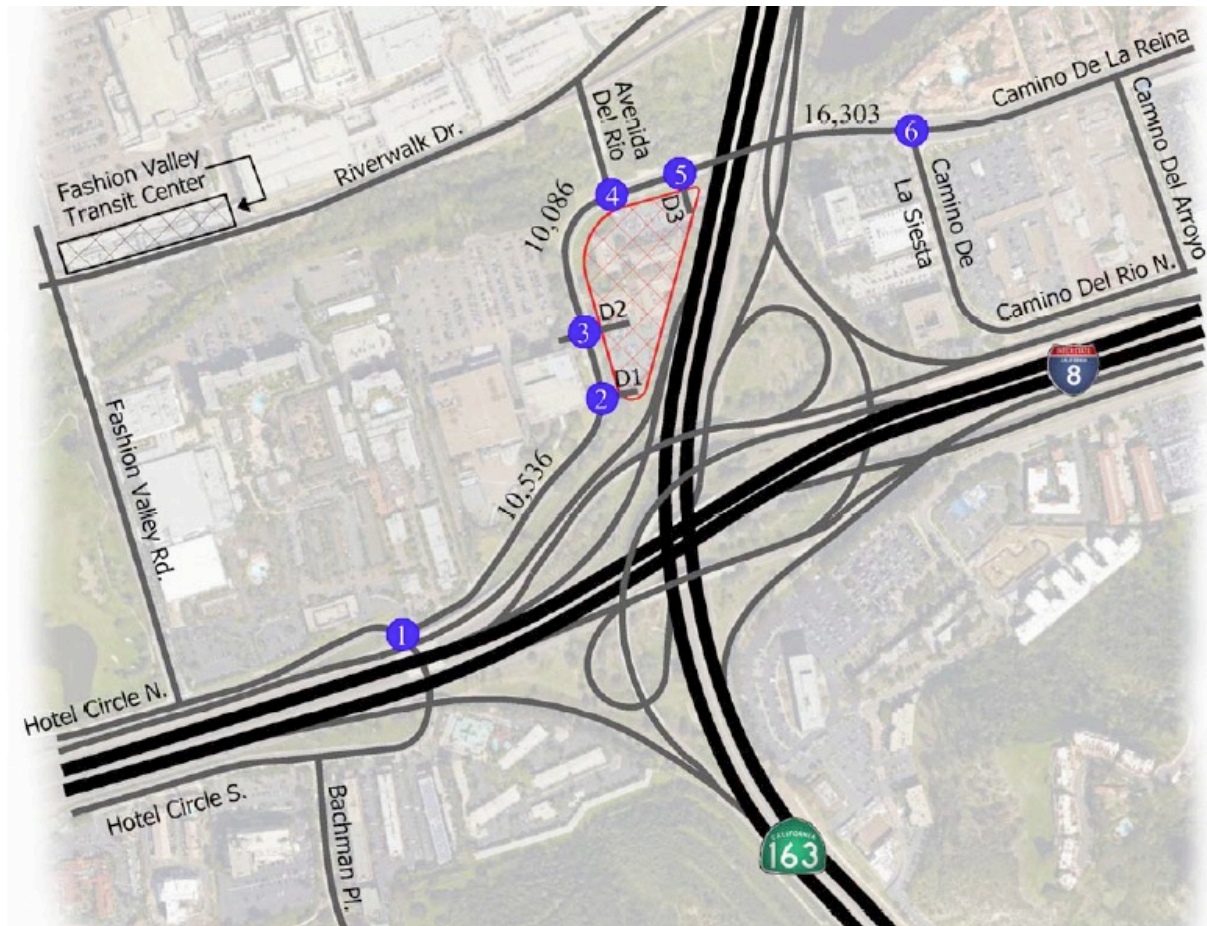


Figure 5.2-6. Opening Day without Project Average Daily Traffic

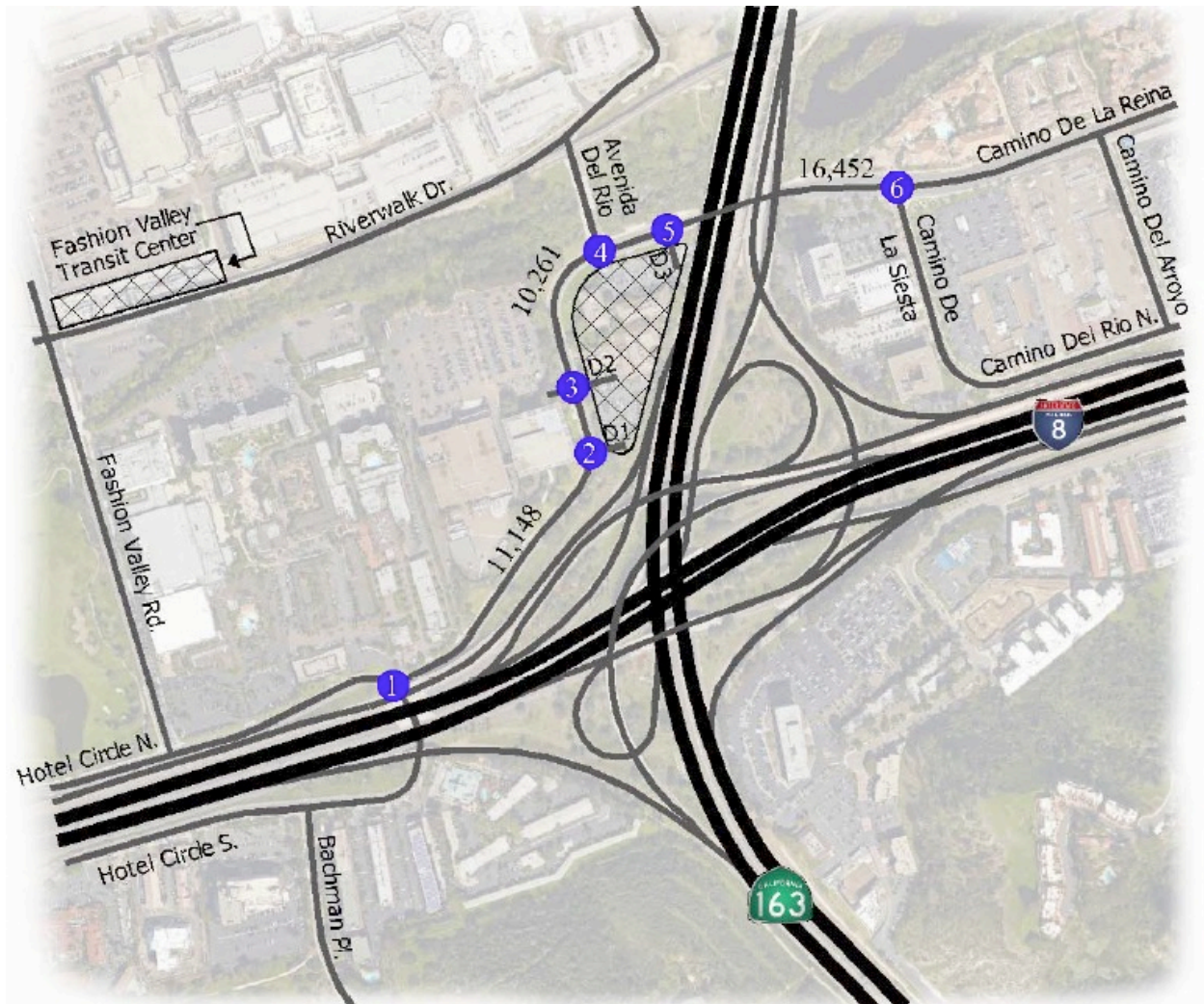


Figure 5.2-7. Opening Day (2019) with Project Average Daily Traffic



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



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

5.3 Visual Effects/Neighborhood Character

5.3.1 Existing Conditions

VIEWS OF THE ON-SITE DEVELOPMENT

The Alexan Fashion Valley project site is situated in the west-central portion of the Mission Valley community (see Figure 2-3, *Project Location Map*). The 4.92-acre project site has been previously graded and is fully developed with 69,651 square feet of office buildings and on-site surface parking; landscaping includes turf, mature trees, and non-native ornamental vegetation (see Figure 2-4, *Existing Site Conditions*). Views of the project site from the south are provided from the I-8 West off-ramp from SR-163 South and are largely screened by landscaping, trees, and vines along perimeter chain-link fencing. The second story of the current building is visible above the fence line, and parking lot views are possible through breaks in the landscaping along the fence. Views of the project from the east are provided from SR-163 South. However, due to the density of mature trees and landscaping along the frontage, views into the site are intermittent and of the rear façades of site buildings. Views of the project site from the north and west are provided from Camino de la Reina, which fronts the project site on the west and north, and are comprised of existing buildings, mature landscaping, and surface parking. Views from the north are also provided from SR-163 and provide a full view of northern buildings and on-site surface parking in the northern portion of the site.

VIEWS FROM THE PROJECT SITE TO OFF-SITE DEVELOPMENT

As shown in Figure 2-3, *Project Location Map*, the Alexan Fashion Valley project site is located south of Camino de la Reina, north of I-8, west of SR-163, and east of Camino de la Reina. The Union-Tribune building is located to the west of the project site, and views to the west are of the Union-Tribune building and surface parking. Views to the north are of the San Diego River channel and Fashion Valley Mall beyond. Views to the east from the project site are blocked by the structure of I-8 West off-ramp from SR-163 South. Views from the project site to the south are of I-8 West off-ramp.

NEIGHBORHOOD CHARACTER

The project site is located in Mission Valley, an urbanized community. Situated in the west-central portion of the community, the character of the surrounding area is an evolving mix of multi-family residential, hotel development, retail commercial in the form of regional malls and several smaller commercial retail centers, and office/light industry development, both as mid- and high-rise structures and more typical low-rise light industrial building. Redevelopment is actively occurring within Mission Valley, most notably on the Vulcan quarry site that is redeveloping as the Civita neighborhood located approximately two miles to the north of the project site, and the Camino del Rio Mixed Use project site located just to the east of the project site. The Union Tribune site, located

across from the project site, has been approved for redevelopment as a mixed-use project with residential, retail, public use space, and a public park. In addition to redevelopment, other developments such as Westfield Mission Valley Mall and Fashion Valley Mall are actively remodeling and modernizing.

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

LIGHT/GLARE/SHADING

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

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

The project site is located in a fully developed urban community. Lighting from commercial office, retail, and residential development, as well as street lighting on public streets and freeways, predominate the area. Because the majority of development in the project area is comprised of retail uses and multi-family residential developments, glare from an expanse of windows is minimal. The nearest office building is the Union Tribune building located to the west of the project site and is approximately five stories in height. The design of that building combines concrete accents and

deeply recessed windows, which limit the amount of glare. Relative to shading, there are no buildings in the immediate project area that can cast substantial shadows on the project site for extended periods of time. The Union Tribune office building to the west of the project site is at such a height and setback from the road in such a manner that afternoon shadows from the building do not reach the project site.

5.3.2 *Impact Analysis*

Thresholds of Significance

Per the Development Services Department's CEQA's *Significance Determination Thresholds* for impacts to visual effects and neighborhood character are:

1. Views

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

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

blockage would be considered “extensive” when the overall scenic quality of a visual resource is changed; for example, from an essentially natural view to a largely manufactured appearance.

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

2. Neighborhood Character/Architecture

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

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

3. Land Form Alteration Grading

Projects that significantly alter the natural landform. To meet this significance threshold, typically the following conditions must apply:

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

- 1) The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms will very closely imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms. This may be achieved through —naturalized variable slopes.
- 2) The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed slopes follow the natural existing landform and at no point vary substantially from the natural landform elevations.
- 3) The proposed excavation or fill is necessary to permit installation of alternative design features such as step-down or detached buildings, non-typical roadway or parking lot designs, and alternative retaining wall designs which reduce the project's overall grading requirements.

4. Development Features

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

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

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

5. Light/Glare

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

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

30 percent (see LDC Section 142.07330(a)), and the project is adjacent to a major public roadway or public area.

- b. The project would shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas.

Issue 1

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

Issue 1 addresses the following threshold of significance:

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

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

Impact Analysis

The proposed project would not create a negative aesthetic site or property. As shown in Figures 3-3a and 3-3b, *Project Elevations*, as well as Figures 5.3-1a through 5.3-1d, *Project Renderings*, the Alexan Fashion Valley project would feature architectural elements such as windows and balconies; varied building mass and rooflines; varied finishes and materials including plaster, smooth stucco, natural concrete, and fiber cement board; painted solid metal paneling; painted solid and perforated railing; galvanized metal post with cable railing railings; and aluminum tube. The project's architectural elements are intended to provide interesting and identifiable features, which would allow pedestrians and the motoring public to easily find their destinations. Architectural features such as varied building materials and finish colors, heights, and setbacks would provide vertical relief to the façades and create focal points around the project for both pedestrians and passing vehicles. The

project's massing, colors, and materials have been selected to complement and blend with the adjacent development, in particular the brick of the adjacent Union Tribune building would be reflected in some of the burnt red and brown accent tones of the proposed project building.

The project's architectural elements have been designed with that thought in mind. The project offers greater architectural detail and color palette than what exists in the nearby office development. Project design includes recessed and protruding elements, such as windows and balconies, to add visual interest and character to the project site. Building mass and rooflines would be varied, as would be proposed finishes and materials, as described above. The project is located within a landmark/view sensitive area and will become a community landmark. The project has been designed to be sensitive to community views. Buildings would setback from the roadways; view openings to and from the project have been provided at amenity areas.

The project would not degrade the visual character of the project site or its surrounding. The project would also not result in creating a negative aesthetic site or property. Significant impacts would not result.

As described above, the project site is located within a designated landmark or view sensitive area, per the Mission Valley Community Plan. Per the Mission Valley Community Plan, view considerations are in relation to the river and are of two types: 1) ground level views from public areas such as roads, and 2) aerial views from the hillsides into the river area and from public areas such as parks and roads in surrounding communities. Neither of these conditions apply to the proposed project, as the project is not sited along the river or hillside; no impacts to view corridors would occur.

Significance of Impacts

The project's impact on the visual character and quality of the surrounding environment is less than significant. The project would feature architectural elements intended to create a positive aesthetic effect, including recessed and protruding elements such as windows and balconies, to add visual interest and character to the project site. Proposed finishes and materials are varied and include plaster, natural concrete, smooth stucco, fiber cement board, solid and perforated metal panels and railings, and aluminum tube. Project design elements, building mass, and varied rooflines would add visual interest and character to the project site. The proposed project would not result in a substantial degradation of the existing visual character or quality of the site or its surroundings.

Mitigation Measures

No mitigation is required.

Significance of Impacts Following Implementation of Mitigation Measures

No mitigation is required.

Issue 2

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

Issue 2 addresses the following threshold of significance:

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

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

Impact Analysis

As discussed above, the project site is located within an urbanized portion of Mission Valley, although due to the unique location of the project site, much of that urbanization is separate from the project site. The Union-Tribune complex is located west of the project site; farther to the west are hotel uses and Riverwalk Golf Course. To the north of the project site is Camino de la Reina, the San Diego River channel, and, beyond the river, Fashion Valley Mall and Fashion Valley Transit Center (to the northwest). The SR-163 South/I-8West interchange predominates the eastern and southern borders of the project site, separating the project site from a multitude of commercial, office, and multi-family residential uses to the east, and hotel uses to the south. The Union-Tribune complex is five stories in height, with surface parking located on the northern portion of the site. The closest developments to the east of the project site, beyond SR-163, are four-story residential buildings, and two multi-story office buildings of 10 stories and four stories with surface and structured parking.

The project proposes a development that would vary in height from five to six stories with mezzanines on the seventh. The residential building would be wrapped around a six-story parking garage on the north, west, and south sides; the parking garage would front the freeway on the east side, acting as a buffer for residential units from the freeway noise. The project would be stepped back from Camino de la Reina, accommodating the expansive plaza and gathering space of The Perch and allowing for a break in mass along Camino de la Reina and the San Diego River. The setback also accommodates the Nature Walk, which would have a meandering decomposed granite

path and interpretive signage, provide passive recreation space between the project buildings and Camino de la Reina.

Additionally, two-story-height commercial spaces on the ground floor of the project at the southwest corner visually opens up the space at this gateway entry to the community by providing windows along the two-story façade, rather than a wall of building. The Nest also acts to demarcate this gateway entry with a statement tree and outdoor gathering space. As features of the project design, amenity areas have been incorporate in a courtyard-like fashion, adding additional breaks to the project massing along Camino de la Reina and inviting views both into the project site and from various angles within the project site to the San Diego River.

Building materials would be compatible with what exists currently, while allowing for modern interpretation of building materials. The adjacent Union-Tribune building is clad in red brick. While the proposed project would use more modern finishing materials such as fiber cement paneling, a burnt/brick-red color would be utilized as an accent color throughout the Camino de la Reina-facing façades, tying the proposed development visually to the adjacent building. Natural concrete is reminiscent of stones found along the San Diego River, and balcony railings would be painted in a shade of green, among other colors, visually reflecting the vegetated river to the north of the project site. Paint finishes in natural tones such as “walnut bark” and “burnt almond” also reflect the river channel’s vegetation. Use of textured and smooth stucco ties visually with development in the great surroundings, which are a combination of older buildings with traditional textured stucco and newer buildings with smooth-finish stucco. The project would not result in bulk, scale, materials, or style that are incompatible with surrounding development. Impacts would be less than significant.

Significance of Impacts

The project would not result in significant bulk, scale, materials, or style impacts. The project proposes a development that would vary in height from six to seven stories, which would be compatible with the greater developments that occur in the surrounding area. Expansive setbacks along Camino de la Reina, especially on the northern and northwestern sides of the project, allow for transitions between existing uses, the San Diego River, and the project. The project would include open areas in the form of a plaza along Camino de la Reina and multiple courtyard-like amenity areas, which would further break up the bulk and scale of the project and avoid a solid massed appearance along the roadways or from nearby views. Building style would be compatible with existing developments and would utilize similar finishes, reflective design, and a diverse color palette. The project would not result in bulk, scale, materials, or style that are incompatible with surrounding development. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are recommended.

Significance of Impacts Following Implementation of Mitigation Measures

No mitigation is required.

Issue 3

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

Issue 3 addresses the following threshold of significance:

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

- a. The project would be moderate to large in scale, more than 50 percent of any single elevation of a building's exterior is built with a material with a light reflectivity greater than 30 percent (see LDC Section 142.07330(a)), and the project is adjacent to a major public roadway or public area.
- b. The project would shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas.

Impact Analysis

The project site is currently fully developed. Current development includes multiple buildings and surface parking. The project area already exhibits several lighting sources, such as streetlights along major roadways and surrounding development parking lot lighting. Other significant sources of light in the area include light on-site from the buildings and parking lighting.

Landscaping and architectural features would be illuminated and accented with lighting. Parking structure and lot lighting would also be provided. Additional lighting would be provided in pedestrian and parking areas to provide necessary security.

The project would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area. Lighting would be regulated by compliance with Section 142.0740 of the City of San Diego Land Development Code. Glare would be avoided in accordance with Section 142.0730 of the City of San Diego Land Development Code.

The proposed project would not contribute to shading of surrounding areas, as the highest portions of the project site are setback from the San Diego River and existing development and would therefore maintain project shading primarily on-site. Off-site shading would be comparable to what

occurs as a result of surrounding developments today, with no buildings tall enough to create permanent pockets of shade throughout the day. Similar to surrounding developments and typical of mid-rise urban development, shading provided by the project would move throughout the day with the movements of the sun.

Significance of Impacts

The proposed project would not result in significant lighting and glare impacts. The project would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area. Lighting would be in conformance with Section 142.0740 of the City of San Diego Land Development Code, and impacts from glare would be avoided by complying with Section 142.0730 of the City of San Diego Land Development Code. The proposed project would not contribute to shading of surrounding areas.

Mitigation Measures

The project would not result in significant impacts related to lighting and glare. No mitigation measures are recommended.

Significance of Impacts Following Implementation of Mitigation Measures

No mitigation is required.

Issue 4

Would the proposal result in substantial alteration to the existing or planned character of the area, such as could occur with the construction of a subdivision in a previously under developed area? Note: for substantial alteration to occur, new development would have to be of a size, scale or design that would markedly contrast with the character of the surrounding area.

Issue 4 addresses the following threshold of significance:

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

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

Impact Analysis

The project site is located in Mission Valley, an urbanized community. The character of the surrounding area is an evolving mix of multi-family residential; hotel development; retail commercial in the form of regional malls and several smaller commercial retail centers; and office/light industry development, both as mid- and high-rise structures and more typical low-rise light industrial building. Redevelopment is actively occurring within Mission Valley. The proposed project would be a mixed-use development consisting of residential, commercial (office) and commercial (retail) uses. The project would range in height from six to seven stories wrapped around a six-story parking garage. The project's massing, colors, and materials have been selected to complement and blend with the adjacent development. The project would not result in substantial alteration to the existing or planned character of the area. Significant impacts would not result.

Significance of Impacts

The proposed project would not result in substantial alteration to the existing or planned character of the area. No significant impact would result.

Mitigation Measures

The project would not result in significant impacts related to substantial alteration to the character of an area. No mitigation measures are recommended.

Significance of Impacts Following Implementation of Mitigation Measures

No mitigation is required.



Figure 5.3-1a. Project Renderings – Street View from Camino de la Reina



Figure 5.3-1b. Project Renderings – View from SR-163



Figure 5.3-1c. Project Renderings – Aerial View Looking Southeast



Figure 5.3-1d. Project Renderings – Aerial View Looking East from Camino del Este Crosswalk

5.4 Air Quality

This section of the EIR is based on the *Air Quality Technical Report* prepared for the proposed project by Scientific Resources Associated, dated July 6, 2016. A copy of the *Air Quality Technical Report* is included as Appendix E to this EIR.

5.4.1 Existing Conditions

CLIMATE AND METEOROLOGY

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

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

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

BACKGROUND AIR QUALITY

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

Table 5.4-1. Ambient Background Concentrations

Pollutant	Average Time	2012	2013	2014	Caaqs	NAAQS	Monitoring Station
Ozone	8 Hour	0.065	0.053	0.072	0.070	0.0075	San Diego
	1 Hour	0.0071	0.063	0.093	0.09	--	San Diego
PM ₁₀	Annual	22.2	25.4	23.8	20 µG/M ³	--	San Diego
	24 Hour	45	90	40	50 µG/M ³	150 µG/M ³	San Diego
PM _{2.5}	Annual	11.0	10.3	10.1	12 µG/M ³	15 µG/M ³	San Diego
	24 Hour	39.8	37.4	36.7	--	35 µG/M ³	San Diego
NO ₂	Annual	NA	NA	0.011	0.030	0.053	San Diego
	1 Hour	0.073	0.057	0.067	0.18	0.100	San Diego
CO	8 Hour	1.9	2.1	1.9	9.0	9	San Diego
	1 Hour	2.6	3.0	2.7	20.0	35	San Diego
NA= Data Not Available							

The San Diego monitoring station did not measure any exceedances of the 8-hour ozone NAAQS from 2012 through 2014, which predates the adoption of the new 8-hour ozone NAAQS of 0.070 ppm. The monitoring data indicates two exceedances of the CAAQS in 2014. The San Diego monitoring station did not measure any exceedances of the state 1-hour ozone standard and the state 8-hour ozone standards in the period from 2012 through 2014. While the San Diego monitoring station measured individual 24-hour values of PM_{2.5} above 35 µg/m³, these values do not constitute an exceedance because the PM_{2.5} standard is set in terms of the 98th percentile of three years of data. The annual CAAQS for PM₁₀ was exceeded from 2012 to 2014, and the 24-hour CAAQS for PM₁₀ was exceeded once in 2013. The data from the monitoring station indicates that air quality is in attainment of all other air quality standards.

REGULATORY SETTING

Federal

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

associated with project construction and operations are based on EPA and the California Air Resources Board (ARB).

Ozone. O_3 is considered a photochemical oxidant, which is a chemical that is formed when reactive organic gases (ROG) and oxides of NO_x , both by-products of combustion, react in the presence of ultraviolet light. O_3 is considered a respiratory irritant and prolonged exposure can reduce lung function, aggravate asthma, and increase susceptibility to respiratory infections. Children and those with existing respiratory diseases are at greatest risk from exposure to O_3 .

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

Nitrogen Dioxide. NO_2 is also a by-product of fuel combustion and is formed both directly as a product of combustion and indirectly in the atmosphere through the reaction of nitrogen oxide (NO) with oxygen. NO_2 is a respiratory irritant and may affect those with existing respiratory illness, including asthma. NO_2 can also increase the risk of respiratory illness.

Respirable Particulate Matter and Fine Particulate Matter. Respirable particulate matter, or PM_{10} , refers to particulate matter with an aerodynamic diameter of 10 microns or less. Fine particulate matter, or $PM_{2.5}$, refers to particulate matter with an aerodynamic diameter of 2.5 microns or less. Particulate matter in this size range has been determined to have the potential to lodge in the lungs and contribute to respiratory problems. PM_{10} and $PM_{2.5}$ arise from a variety of sources, including road dust, diesel exhaust, combustion, tire and brake wear, construction operations, and windblown dust. PM_{10} and $PM_{2.5}$ can increase susceptibility to respiratory infections and can aggravate existing respiratory diseases such as asthma and chronic bronchitis. $PM_{2.5}$ is considered to have the potential to lodge deeper in the lungs.

Sulfur dioxide. SO_2 is a colorless, reactive gas that is produced from the burning of sulfur-containing fuels such as coal and oil, and by other industrial processes. Generally, the highest concentrations of SO_2 are found near large industrial sources. SO_2 is a respiratory irritant that can cause narrowing of the airways leading to wheezing and shortness of breath. Long-term exposure to SO_2 can cause respiratory illness and aggravate existing cardiovascular disease.

Lead. Pb in the atmosphere occurs as particulate matter. Pb has historically been emitted from vehicles combusting leaded gasoline, as well as from industrial sources. With the phase-out of leaded gasoline, large manufacturing facilities are the sources of the largest amounts of lead

emissions. Pb has the potential to cause gastrointestinal, central nervous system, kidney, and blood diseases upon prolonged exposure. Pb is also classified as a probable human carcinogen.

State

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

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

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

Hydrogen Sulfide (H₂S). H₂S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas, and can be emitted as the result of geothermal energy exploitation. Breathing H₂S at levels above the standard would result in exposure to a very disagreeable odor. In 1984, an ARB committee concluded that the ambient standard for H₂S is adequate to protect public health and to significantly reduce odor annoyance.

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

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

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

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

Table 5.4-2. Ambient Air Quality Standards

Pollutant	Average Time	California Standards		National Standards		
		Concentration	Method	Primary	Secondary	Method
Ozone (O ₃)	1 hour	0.09 ppm (176 µg/m ³)	Ultraviolet Photometry	--	--	Ethylene Chemiluminescence
	8 hour	0.070 ppm (137 µg/m ³)		0.075 ppm (147 µg/m ³)	0.075 ppm (147 µg/m ³)	
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 mg/m ³)	Non-Dispersive Infrared Spectroscopy (NDIR)	9 ppm (10 mg/m ³)	--	Non-Dispersive Infrared Spectroscopy (NDIR)
	1 hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)		
Nitrogen Dioxide (NO ₂)	Annual Average	0.030 ppm (56 µg/m ³)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m ³)	--	Gas Phase Chemiluminescence
	1 hour	0.18 ppm (338 µg/m ³)		0.100 ppm (188 µg/m ³)	--	
Sulfur Dioxide (SO ₂)	24 hours	0.04 ppm (105 µg/m ³)	Ultraviolet Fluorescence	--	--	Pararosaniline
	3 hours	--		--	0.5 ppm (1300 µg/m ³)	
	1 hour	0.25 ppm (655 µg/m ³)		0.075 ppm (196 µg/m ³)	--	
Respirable Particulate Matter (PM ₁₀)	24 hours	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	150 µg/m ³	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		--	--	
Fine Particulate Matter (PM _{2.5})	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12 µg/m ³	--	Inertial Separation and Gravimetric Analysis
	24 hours	--		35 µg/m ³	--	
Sulfates	24 hours	25 µg/m ³	Ion Chromatography	--	--	--
Lead	30-day Average	1.5 µg/m ³	Atomic Absorption	--	--	Atomic Absorption
	Calendar Quarter	--		1.5 µg/m ³	1.5 µg/m ³	
	3-Month Rolling Average	--		0.15 µg/m ³	0.15 µg/m ³	
Hydrogen Sulfide	1 hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence	--	--	--
Vinyl Chloride	24 hours	0.010 ppm (26 µg/m ³)	Gas Chromatography	--	--	--

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

Source: California Air Resources Board, www.arb.ca.gov, 2012, <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>

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

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

A number of programs and strategies to reduce diesel particulate matter are in place or are in the process of being developed as part of the ARB's Diesel Risk Reduction Program. Some of these programs and strategies include those that would apply to construction and operation of the project, including the following:

- In 2001, the ARB adopted new particulate matter and NO_x emission standards to clean up large diesel engines that power big-rig trucks, trash trucks, delivery vans and other large vehicles. The new standard for particulate matter takes effect in 2007 and reduces emissions to 0.01 gram of particulate matter per brake horsepower-hour (g/bhp-hr.) This is a 90 percent reduction from the existing particulate matter standard. New engines will meet the 0.01 g/bhp-hr particulate matter standard with the aid of diesel particulate filters that trap the particulate matter before exhaust leaves the vehicle.
- ARB has worked closely with the United States EPA on developing new particulate matter and NO_x standards for engines used in offroad equipment such as backhoes, graders, and farm equipment. U.S EPA has proposed new standards that would reduce the emission from off-road engines to similar levels to the on-road engines discussed above by 2010 – 2012. These new engine standards were adopted as part of the Clean Air Nonroad Diesel Final Rule in 2004. Once approved by U.S. EPA, ARB will adopt these as the applicable state standards for new off-road engines. These standards will reduce diesel particulate matter emission by over 90 percent from new off-road engines currently sold in California.
- The ARB has adopted several regulations that will reduce diesel emissions from in-use vehicles and engines throughout California. In some cases, the particulate matter reduction strategies also reduce smog-forming emissions such as NO_x.

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

The local APCD has the primary responsibility for the development and implementation of rules and regulations designed to attain the NAAQS and CAAQS, as well as the permitting of new or modified sources, development of air quality management plans, and adoption and enforcement of air

pollution regulations. The San Diego APCD is the local agency responsible for the administration and enforcement of air quality regulations in San Diego County.

The APCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The San Diego County RAQS was initially adopted in 1991, and is updated on a triennial basis. The RAQS was updated in 1995, 1998, 2001, 2004, and most recently in 2009. The RAQS outlines APCD's plans and control measures designed to attain the state air quality standards for O₃. The RAQS does not address the State air quality standards for PM₁₀ or PM_{2.5}. The APCD has also developed the air basin's input to the State Implementation Plan (SIP), which is required under the Federal Clean Air Act for areas that are out of attainment of air quality standards. The SIP includes the APCD's plans and control measures for attaining the O₃ NAAQS. The SIP is also updated on a triennial basis. The latest SIP update was submitted by the ARB to the EPA in 1998, and the APCD is in the process of updating its SIP to reflect the new 8-hour O₃ NAAQS. To that end, the APCD has developed its *Eight-Hour Ozone Attainment Plan for San Diego County* (hereinafter referred to as the Attainment Plan). The Attainment Plan forms the basis for the SIP update, as it contains documentation on emission inventories and trends, the APCD's emission control strategy, and an attainment demonstration that shows that the SDAB will meet the NAAQS for O₃. Emission inventories, projections, and trends in the Attainment Plan are based on the latest O₃ SIP planning emission projections compiled and maintained by ARB. The inventories are based on data submitted by stakeholder agencies, including SANDAG, based on growth projections in municipal General Plans.

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

Because the ARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends as well as land use plans developed by the cities and by the County as

part of the development of general plans, projects that propose development that is consistent with the growth anticipated by the general plans would be consistent with the RAQS and the Attainment Plan. In the event that a project would propose development which is less dense than anticipated within the general plan, the project would likewise be consistent with the RAQS and the Attainment Plan. If a project proposes development that is greater than that anticipated in the general plan and SANDAG's growth projections, the project might be in conflict with the RAQS and SIP, and might have a potentially significant impact on air quality.

Local

In San Diego County, the San Diego Air Pollution Control District (SDAPCD) is the regulatory agency that is responsible for maintaining air quality, including implementation and enforcement of State and Federal regulations. The project site is located in the City of San Diego. The City of San Diego has not adopted specific regulations to govern air quality. The Conservation Element of the City's General Plan (City of San Diego 2008) includes policies that encourage development in a manner that benefits San Diego's environment and economy. These policies encourage green building practices and sustainable development. The policies also promote infill development, which reduces emissions from vehicles.

5.4.2 Impact Analysis

Thresholds of Significance

According to the City's Significance Determination Thresholds, a project would have a significant environmental impact if the project would result in:

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

In their Significance Determination Thresholds, the City of San Diego has adopted emission thresholds based on the thresholds for an Air Quality Impact Assessment in the San Diego Air

Pollution Control District's Rule 20.2. These thresholds are shown in Table 5.4-3, *Significance Criteria for Air Quality Impacts*.

Table 5.4-3. Significance Criteria for Air Quality Impacts

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

In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the State and Federal government as TACs or Hazardous Air Pollutants (HAPs). If a project has the potential to result in emissions of any TAC or HAP that may expose sensitive receptors to substantial pollutant concentrations, the project would be deemed to have a potentially significant impact. With regard to evaluating whether a project would have a significant impact on sensitive receptors, air quality regulators typically define sensitive receptors as schools (Preschool to 12th Grade), hospitals, resident care facilities, day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

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

The impacts associated with construction and operation of the Alexan Fashion Valley project were evaluated for significance based on these significance criteria.

Issue 1

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

Issue 1 addresses the following threshold of significance:

- A conflict with or obstruct the implementation of the applicable air quality plan
- 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)

Impact Analysis

As discussed in above and in the Air Quality Technical Report, the SIP is the document that sets forth the State's strategies for attaining and maintaining the NAAQS. The APCD is responsible for developing the San Diego portion of the SIP, and has developed an attainment plan for attaining the

8-hour NAAQS for O₃. The RAQS sets forth the plans and programs designed to meet the State air quality standards. Through the RAQS and SIP planning processes, the APCD adopts rules, regulations, and programs designed to achieve attainment of the ambient air quality standards and maintain air quality in the SDAB.

Conformance with the RAQS and SIP determines whether a project will conflict with or obstruct implementation of the applicable air quality plans. The basis for the RAQS and SIP is the distribution of population in the San Diego region as projected by SANDAG. Growth forecasting is based in part on the land uses established by the General Plan. The project is replacing an existing office building with a mixed-use development, which is consistent with the City's plans for developing a mix of uses. The project would be consistent with the Mission Valley Community Plan and is, therefore, consistent with the General Plan. Accordingly, the proposed project is consistent with the applicable air quality plans, and would not result in a significant impact.

Significance of Impacts

The applicable air quality control plans include the RAQS, the SIP, and SANDAG's Transportation Control Measures. The proposed project is consistent with these air quality plans. No impact would result.

Mitigation Measures

No significant impacts to the applicable air quality plans would result. No mitigation is required.

Significance of Impacts Following Implementation of Mitigation Measures

No significant impacts to the applicable air quality plans would result. No mitigation is required.

Issue 2

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

Issue 2 addresses the following threshold of significance:

- A violation of any air quality standard or contribute substantially to an existing or projected air quality violation

To address this significance threshold, an evaluation of emissions associated with both the construction and operational phases of the project was conducted. A discussion of the impacts relative to construction is included below, under *Air Quality Issue 3*. The discussion that follows addresses the project's operational impacts. Operational impacts associated with the Alexan Fashion Valley project would include impacts associated with vehicular traffic, as well as area sources such as energy use, landscaping, consumer products use, and architectural coatings use for maintenance purposes.

Impact Analysis

The *Fashion Valley Apartments Traffic Impact Analysis* (Urban Systems Associates 2016) calculated project trip generation rates based on the proposed development. According to the Traffic Impact Analysis, accounting for transit reductions and mixed-use reductions, the project will generate 2,119 ADT. These trip generation rates were accounted for within the CalEEMod Model runs for vehicular emissions. It should be noted that the existing office building, which will be demolished as part of the proposed project, generates 1,245 ADT, for a net increase in trips of 874 ADT associated with the proposed project.

Operational impacts associated with vehicular traffic and area sources including energy use, landscaping, consumer products use, hearth emissions, and architectural coatings use for maintenance purposes were estimated using the CalEEMod Model. The CalEEMod Model calculates vehicle emissions based on emission factors from the EMFAC2011 model. It was assumed that the first year of full occupancy would be 2019. Based on the results of the EMFAC2011 model for subsequent years, emissions would decrease on an annual basis from 2016 onward due to phase-out of higher polluting vehicles and implementation of more stringent emission standards that are taken into account in the EMFAC2011 model. Table 5.4-4, *Operational Emissions*, presents the results of the emission calculations, in lbs/day, for the Alexan Fashion Valley project.

Table 5.4-4. Operational Emissions

	ROG	NOx	CO	SO _x	PM ₁₀	PM _{2.5}
Summer Day, lbs/day						
Area Sources	9.54	0.27	23.51	0.00	0.13	0.13
Energy Use	0.06	0.49	0.28	0.00	0.04	0.04
Vehicular Emissions	7.99	14.45	68.78	0.11	7.65	2.18
TOTAL	17.59	15.21	92.57	0.12	7.82	2.34
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
Winter Day, lbs/day						
Area Sources	9.54	0.27	23.51	0.00	0.13	0.13
Energy Use	0.06	0.49	0.28	0.00	0.04	0.04
Vehicular Emissions	8.69	15.33	75.37	0.11	7.66	2.18
TOTAL	18.29	16.09	99.16	0.11	7.82	2.35
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No

Based on the estimates of the emissions associated with project operations, the emissions of all criteria pollutants are below the significance thresholds for the project. Impacts would be less than significant.

Projects involving traffic impacts may result in the formation of locally high concentrations of CO, known as CO "hot spots." To verify that the project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO "hot spots" was conducted. The Caltrans ITS Transportation Project-Level Carbon Monoxide Protocol were followed to determine whether a CO "hot spot" is likely to form due to project generated traffic. In accordance with the

Protocol, CO “hot spots” are typically evaluated when (a) the LOS of an intersection or roadway decreases to a LOS E or worse; (b) signalization and/or channelization is added to an intersection; and (c) sensitive receptors such as residences, commercial developments, schools, hospitals, etc. are located in the vicinity of the affected intersection or roadway segment.

The Traffic Impact Analysis evaluated whether or not there would be a decrease in the level of service at the intersections affected by the Project. The Traffic Impact Analysis studied six intersections in the project study area and concluded that the project would not cause a degradation in LOS and would not result in significant impacts to traffic due to congestion at intersections. Accordingly, the project would not cause a CO “hot spot” and no significant impacts would result. The project would therefore not result in an exceedance of the CO standard, and the project would not cause or contribute to a violation of this air quality standard.

Significance of Impacts

Operational emissions would be below the significance thresholds for all pollutants. Additionally, CO impacts would be less than significant because no CO “hot spots” would result from the project. Therefore, air quality impacts associated with project operations would not be significant.

Mitigation Measures

Project impacts associated with emissions during project operations are less than significant. No mitigation is required.

Significance of Impacts Following Implementation of Mitigation Measures

Project impacts associated with emissions during project operations are less than significant. No mitigation is required.

Issue 3

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

Issue 3 addresses the following threshold of significance:

- Construction activities that exceed 100 pounds per day of Particulate Matter (dust)

Impact Analysis

Emissions of pollutants such as fugitive dust and heavy equipment exhaust that are generated during construction are generally highest near the construction site. Emissions from the construction of the project were estimated using the CalEEMod Model (ENVIRON 2013). It was assumed that construction would require the following phases: fine grading, utilities installation, building construction, paving, and architectural coatings application.

The CalEEMod Model provides default assumptions regarding horsepower rating, load factors for heavy equipment, and hours of operation per day. Default assumptions within the CalEEMod Model and assumptions for similar projects were used to represent operation of heavy construction equipment.

Construction calculations within the CalEEMod Model utilize the number and type of equipment shown in Table 5.4-5 to calculate emissions from heavy construction equipment. The methodology used involves multiplication of the number of pieces of each type of equipment times the equipment horsepower rating, load factor, and OFFROAD emission factor, as shown in the equation below:

$$\text{Emissions, lbs/day} = (\text{Number of pieces of equipment}) \times (\text{equipment horsepower}) \times (\text{load factor}) \times (\text{hours of operation per day}) \times (\text{OFFROAD emission factor, lbs/hp-hr})$$

In addition to calculating emissions from heavy construction equipment, the CalEEMod Model contains calculation modules to estimate emissions of fugitive dust, based on the amount of earthmoving or surface disturbance required; emissions from heavy-duty truck trips or vendor trips during construction activities; emissions from construction worker vehicles during daily commutes; emissions of ROG from paving using asphalt and emissions of ROG during application of architectural coatings. As part of the project design features, it was assumed that standard dust control measures (watering three times daily; using soil stabilizers on unpaved roads) and architectural coatings that comply with SDAPCD Rule 67.0.1 (assumed to meet a VOC content of 50 grams per liter (g/l) for flat coatings and 100 g/l for non-flat coatings) would be used during construction. Table 5.4-5, *Estimated Maximum Daily Construction Emissions*, provides the detailed construction emission estimates as calculated with the CalEEMod Model.

Standard dust control measures would be employed during construction. These standard dust control measures include the following:

- Watering active grading sites a minimum of three times daily
- Apply soil stabilizers to inactive construction sites
- Replace ground cover in disturbed areas as soon as possible
- Control dust during equipment loading/unloading (load moist material, ensure at least 12 inches of freeboard in haul trucks)
- Reduce speeds on unpaved roads to 15 mph or less
- Water unpaved roads a minimum of three times daily

Table 5.4-5. Estimated Maximum Daily Construction Emissions

Emission Source	ROG	NOx	CO	SO2	PM ₁₀	PM _{2.5}
Demolition						
Fugitive Dust	--	--	--	--	1.18	0.18
Off-Road Equipment	4.05	42.70	33.89	0.04	2.13	1.98
On-Road Emissions	0.25	3.44	2.63	0.01	0.29	0.11
Worker Trips	0.05	0.06	0.61	0.00	0.12	0.03
Subtotal	4.35	46.20	37.13	0.05	3.72	2.29
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
Grading						
Fugitive Dust	--	--	--	--	2.46	1.31
Off-Road Equipment	3.46	35.98	25.38	0.03	2.04	1.88
	3.49	47.54	36.29	0.14	3.95	1.50
Worker Trips	0.05	0.06	0.61	0.00	0.12	0.03
Subtotal	6.90	83.58	62.28	0.17	8.57	4.72
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
Building Construction						
Off-Road Equipment	3.10	26.41	18.31	0.03	1.78	1.67
Vendor Trips	0.31	2.71	3.34	0.01	0.25	0.10
Worker Trips	0.66	0.78	8.46	0.02	1.73	0.47
Subtotal	4.07	29.90	29.93	0.06	3.76	2.24
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
Paving						
Off-Road Equipment	1.41	14.32	12.26	0.02	0.83	0.76
Worker Trips	0.06	0.07	0.73	0.00	0.17	0.04
Subtotal	1.47	14.39	12.99	0.02	1.00	0.80
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
Architectural Coatings Application						
Architectural Coatings	21.00	--	--	--	--	--
Off-Road Equipment	0.30	2.01	1.85	0.00	0.15	0.15
Worker Trips	0.12	0.14	1.54	0.00	0.35	0.09
Subtotal	21.42	2.15	3.39	0.00	0.50	0.24
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
MAXIMUM DAILY EMISSIONS*	26.45	83.57	62.28	0.17	8.58	4.71
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No

* Maximum daily PM₁₀ emissions occur during demolition. Maximum emissions of other criteria pollutants during simultaneous building construction, paving, and architectural coatings application

These dust control measures would reduce the amount of fugitive dust generated during construction. In addition to dust control measures, architectural coatings applied to interior and exterior surfaces would be required to meet the ROG limitations of SDAPCD Rule 67.0, which limits the ROG content of most coatings to 150 grams/liter. Coatings would also be applied using high volume, low pressure spray equipment to reduce overspray to the extent possible.

As shown in Table 5.4-5, emissions of criteria pollutants during construction would be below the thresholds of significance for all project construction phases. Project criteria pollutant emissions during construction would be temporary. Impacts during construction are less than significant.

Significance of Impacts

Construction impacts would be temporary and for a short duration. Impacts during construction would be less than significant.

Mitigation Measures

Construction impacts would be less than significant. No mitigation is required.

Significance of Impacts Following Implementation of Mitigation Measures

Construction impacts would be less than significant. No mitigation is required.

Issue 4

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

Issue 4 addresses the following threshold of significance:

- Creating objectionable odors affecting a substantial number of people

Impact Analysis

Project construction could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust. These compounds would be emitted in various amounts and at various locations during construction. Sensitive receptors located in the vicinity of the construction site include the residences to the east of the site. Odors are highest near the source and would quickly dissipate offsite; any odors associated with construction would be temporary.

The project is a residential/mixed use development and would not include land uses that would be sources of nuisance odors. Thus the potential for odor impacts associated with the project is less than significant.

Significance of Impacts

The proposed project does not include land uses that would be sources of nuisance odors. Any odors present during construction would be temporary and likely not affect sensitive receptors (residences), as these receptors are located 0.2 miles from the project. Project impacts are less than significant.

Mitigation Measures

Project impacts related to objectionable or nuisance odors are less than significant. No mitigation is required.

Significance of Impacts Following Implementation of Mitigation Measures

Project impacts related to objectionable or nuisance odors are less than significant. No mitigation is required.

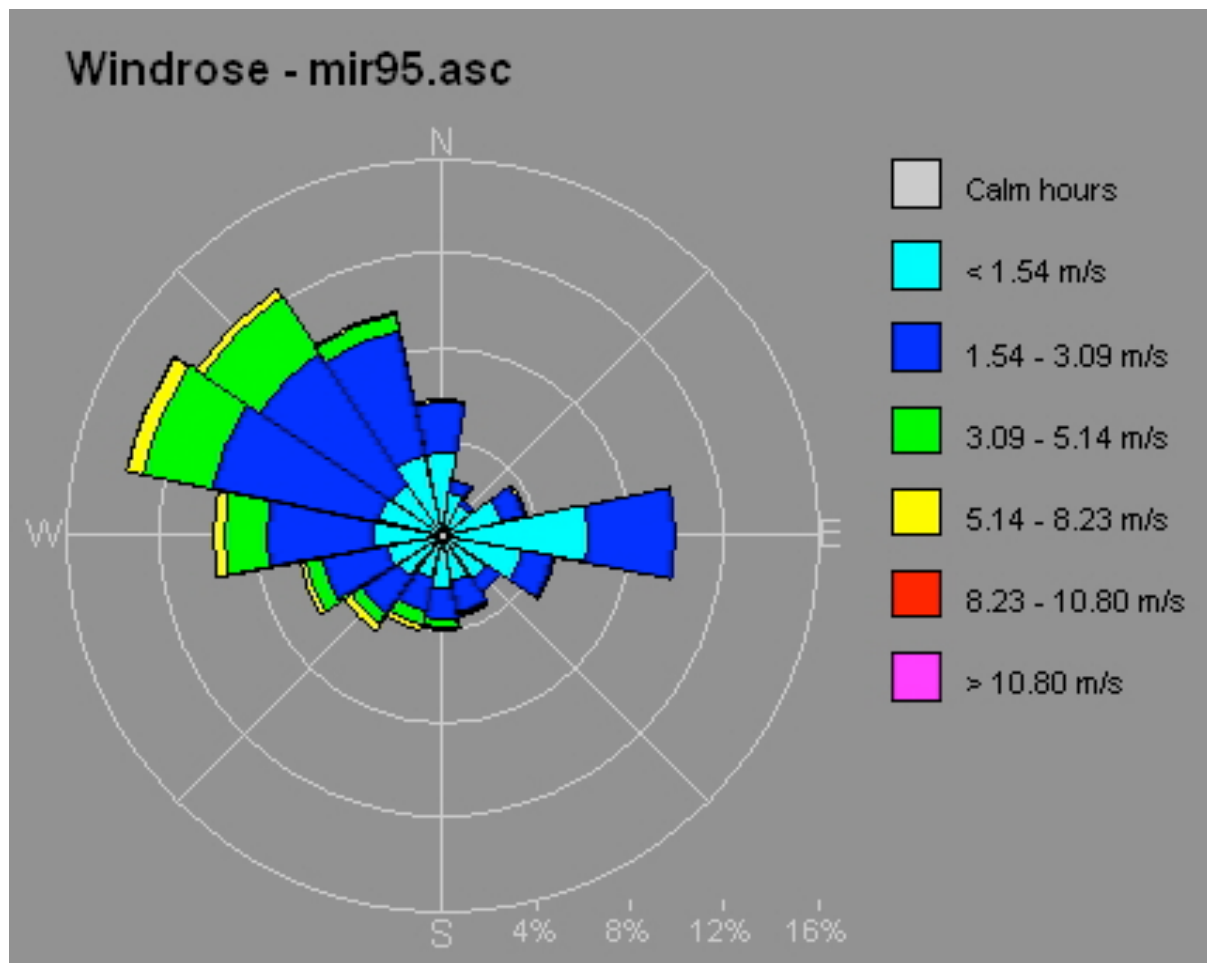


Figure 5.4-1. Wind Rose – MCAS Miramar

5.5 Global Climate Change

This section of the EIR is based on the *Global Climate Change Evaluation* prepared for the proposed project by Scientific Resources Associated, dated July 6, 2016. A copy of the *Global Climate Change Evaluation* is included as Appendix F to this EIR. By nature, greenhouse gas and global climate change evaluations are a cumulative study, which takes into account the entirety of the immediately surrounding area.

5.5.1 Existing Conditions

BACKGROUND

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

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

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

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

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

SOURCES AND GLOBAL WARMING POTENTIALS OF GHG

Anthropogenic sources of CO₂ include combustion of fossil fuels (coal, oil, natural gas, gasoline and wood). CH₄ is the main component of natural gas and also arises naturally from anaerobic decay of organic matter. Accordingly, anthropogenic sources of CH₄ include landfills, fermentation of manure and cattle farming. Anthropogenic sources of N₂O include combustion of fossil fuels and industrial processes such as nylon production and production of nitric acid. Other GHGs are present in trace amounts in the atmosphere and are generated from various industrial or other uses.

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

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

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

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

The California ARB compiled a statewide inventory of anthropogenic GHG emissions and sinks that includes estimates for CO₂, CH₄, N₂O, SF₆, HFCs, and PFCs. The current inventory covers the years 1990 to 2012, and is summarized in Table 5.5-2. Data sources used to calculate this GHG inventory include California and federal agencies, international organizations, and industry associations. The calculation methodologies are consistent with guidance from the IPCC. The 1990 emissions level is the sum total of sources and sinks from all sectors and categories in the inventory. The inventory is

divided into seven broad sectors and categories in the inventory. These sectors include: Agriculture, Commercial, Electricity Generation, Forestry, Industrial, Residential, and Transportation.

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

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

In addition to the statewide GHG inventory prepared by the ARB, a GHG inventory was prepared by the University of San Diego School of Law Energy Policy Initiative Center (EPIC) for the San Diego region (University of San Diego 2008). The San Diego County Greenhouse Gas Inventory (SDCGHGI) takes into account the unique characteristics of the region when estimating emissions, and estimated emissions for years 1990, 2006, and 2020. Based on this inventory and the emission projections for the region, EPIC found that GHG emissions must be reduced by 33 percent below business as usual conditions for year 2020 in order for San Diego County to return to 1990 emission levels. "Business as usual" is defined as the emissions that would occur without any greenhouse gas reduction measures¹. For example, construction of buildings using 2005 Title 24 building standards, and not subsequently enacted more rigorous standards, would create "business as usual" emissions.

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

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

Sector	Total Emissions (MMTCO ₂ e)	Percent of Total Emissions
On-Road Transportation	16	46%
Electricity	9	25%
Natural Gas Consumption	3	9%
Civil Aviation	1.7	5%
Industrial Processes & Products	1.6	5%
Other Fuels/Other	1.1	4%
Off-Road Equipment & Vehicles	1.3	4%
Waste	0.7	2%
Agriculture/Forestry/Land Use	0.7	2%
Rail	0.3	1%
Water-Born Navigation	0.13	0.4%
Source: EPIC's SDCGHGI, 2008		

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

In its Climate Action Plan (City of San Diego 2015), the City identified the 2010 baseline for GHG emissions of 13,091,591 million metric tons equivalent CO₂ (MT CO₂e). Based on the community-wide emissions inventory, 55 percent of the baseline emissions are attributable to transportation, 23 percent are attributable to electricity use, 17 percent are attributable to natural gas use, and five percent are attributable to solid waste and wastewater handling and treatment.

TYPICAL ADVERSE EFFECTS

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

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

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

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

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

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

Ecosystems/Habitats. Continued global warming will likely shift the ranges of existing invasive plants and weeds, thus altering competition patterns with native plants. Range expansion is expected in many species while range contractions are less likely in rapidly evolving species with significant populations already established. Continued global warming is also likely to increase the populations of and types of pests. Continued global warming would also affect natural ecosystems and biological habitats throughout the State.

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

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

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

Compliance with IBMC Section 15.50.160, Flood Hazard Reduction Standards, would require development within coastal high hazard areas to be elevated above the base flood level and be adequately anchored to resist flotation, collapse, and lateral movement as detailed in the regulatory setting section. The Project is not within the coastal high hazard area, and is therefore not subject to the standards. It is not anticipated that the levels of sea level rise predicted for the area would affect the project.

REGULATORY SETTING

All levels of government have some responsibility for the protection of air quality, and each level (Federal, State, and regional/local) has specific responsibilities relating to air quality regulation. GHG

emissions and the regulation of GHGs is a relatively new component of this air quality regulatory framework.

National and International Efforts

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

On March 21, 1994, the United States joined a number of countries around the world in signing the United Nations Framework Convention on Climate Change. Under the Convention, governments agreed to gather and share information on GHG emissions, national policies, and best practices; launch national strategies for addressing GHG emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of global climate change. The U.S. Supreme Court rules in *Massachusetts v. Environmental Protection Agency*, 549 U.S. 497 (2007), that USEPA has the ability to regulate GHG emissions. In addition to the national and international efforts described above, many local jurisdictions have adopted climate change policies and programs.

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

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

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

These findings do not themselves impose any requirements on industry or other entities. However, this action was a prerequisite to finalizing the EPA's proposed greenhouse gas emission standards for light-duty vehicles, which were jointly proposed by EPA and the Department of Transportation's National Highway Safety Administration on September 15, 2009 and adopted on April 1, 2010. As finalized in April 2010, the emissions standards rule for vehicles will improve average fuel economy standards to 35.5 miles per gallon by 2016. In addition, the rule will require model year 2016

vehicles to meet an estimated combined average emission level of 250 grams of carbon dioxide per mile.

Mandatory GHG Reporting Rule. On March 10, 2009, in response to the FY2008 Consolidated Appropriations Act (H.R. 2764; Public Law 110-161), the EPA proposed a rule that requires mandatory reporting of GHG emissions from large sources in the United States. On September 22, 2009, the Final Mandatory Reporting of Greenhouse Gases Rule was signed, and was published in the Federal Register on October 30, 2009. The rule became effective on December 29, 2009. The rule will collect accurate and comprehensive emissions data to inform future policy decisions.

The EPA is requiring suppliers of fossil fuels or industrial greenhouse gases, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions to submit annual reports to EPA. The gases covered by the proposed rule are CO_2 , CH_4 , N_2O , HFC, PFC, SF_6 , and other fluorinated gases, including nitrogen trifluoride (NF_3) and hydrofluorinated ethers (HFE).

State

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

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

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

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

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

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

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

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

On December 31, 2009, the CNRA adopted the proposed amendments to the State CEQA Guidelines. These amendments became effective on March 18, 2010.

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

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

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

California Code of Regulations Title 24. Although not originally intended to reduce greenhouse gas emissions, California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The GHG emission inventory was based on Title 24 standards as of October 2005; however, Title 24 has been updated as of 2008 and standards are set to be phased in beginning in January 2010. The new Title 24 standards are anticipated to increase energy efficiency by 15 percent, thereby reducing GHG emissions from energy use by 15 percent. Energy efficient buildings

require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for water heating) results in greenhouse gas emissions. Therefore, increased energy efficiency results in decreased greenhouse gas emissions.

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

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

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

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

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

Senate Bill 375. SB 375 finds that GHG from autos and light trucks can be substantially reduced by new vehicle technology, but even so "it will be necessary to achieve significant additional

greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32." Therefore, SB 375 requires that regions with metropolitan planning organizations adopt sustainable communities strategies, as part of their regional transportation plans, which are designed to achieve certain goals for the reduction of GHG emissions from mobile sources.

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

Local Regulations and Standards

The City of San Diego adopted a Climate Protection Action Plan (City of San Diego 2005) that identified early goals for the reduction of GHG emissions for City facilities. The plan did not address City development, but rather focused on how the City itself could reduce emissions through implementing policies such as recycling, energy efficiency and alternative energy programs, and transportation programs. The City has also adopted guidance for evaluating GHG impacts in its Memorandum: UPDATED – Addressing Greenhouse Gas Emissions from Projects subject to CEQA (City of San Diego 2010). Although the City of San Diego has not formally adopted thresholds of significance or guidance in determining the significance of GHG emissions, the City is currently utilizing an interim GHG emission threshold for commercial and residential land use development projects subject to CEQA. This interim threshold is based on the 900 MT screening threshold in the California Air Pollution Control Officers Association (CAPCOA) report "CEQA & Climate Change" (CAPCOA 2008) and serves as a conservative screening threshold for requiring further analysis for projects subject to CEQA.

In December 2015, the City of San Diego adopted its CAP. The CAP establishes a baseline for 2010, sets goals for GHG reductions for the milestone years 2020 and 2035, and details the implementation actions and phasing for achieving the goals. To implement the state's goals of reducing emissions to 15 percent below 2010 levels by 2020, and 49 percent below 2010 levels by 2035, the City will be required to implement strategies that would reduce emissions to approximately 10.6 MMT CO₂e by 2020 and to 6.4 MMT CO₂e by 2035. The CAP determined that, with implementation of the measures identified therein, the City would exceed the state's targets for 2020 and 2035.

The City of San Diego has adopted policies in their Conservation Element that address state and federal efforts to reduce GHG emissions. The policies that are applicable to the project include the following:

Policy CE-A.5	<p>Employ sustainable or “green” building techniques for the construction and operation of buildings.</p> <p>(a) Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings. This can be accomplished through factors including, but not limited to:</p> <ul style="list-style-type: none">• Designing mechanical and electrical systems that achieve greater energy efficiency with currently available technology;• Minimizing energy use through innovative site design and building orientation that addresses factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens;• Employing self generation of energy using renewable technologies;• Combining energy efficient measures that have longer payback periods with measures that have shorter payback periods;• Reducing levels of non-essential lighting, heating and cooling; and• Using energy efficient appliances and lighting. <p>(b) Provide technical services for “green” buildings in partnership with other agencies and organizations.</p>
Policy CE-A-7	<p>Construct and operate buildings using materials, methods, and mechanical and electrical systems that ensure a healthful indoor air quality. Avoid contamination by carcinogens, volatile organic compounds, fungi, molds, bacteria, and other known toxins.</p> <p>(a) Eliminate the use of chlorofluorocarbon-based refrigerants in newly constructed facilities and major building renovations and retrofits for all heating, ventilation, air conditioning, and refrigerant-based building systems.</p> <p>(b) Reduce the quantity of indoor air contaminants that are odorous or potentially irritating to protect installers and occupants’ health and comfort. Where feasible, select low-emitting adhesives, paints, coatings, carpet systems, composite wood, agrifiber products, and others.</p>
Policy CE-A.8	<p>Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or be renovating or adding on to existing buildings, rather than constructing new buildings.</p>

- Policy CE-A.9 Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:
- Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;
 - Using life cycle costing in decision making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system;
 - Removing code obstacles to using recycled materials and for construction; and
 - Implementing effective economic incentives to recycle construction and demolition debris.
- Policy CE-A.10 Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.
- Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.
 - Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage of paper, glass, plastic, metals, yard waste, and other materials as needed.
- Policy CE-A.11 Implement sustainable landscape design and maintenance.
- (a) Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers.
 - (b) Encourage composting efforts through education, incentives, and other activities.
 - (c) Decrease the amount of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities.
 - (d) Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals.
 - (e) Reduce use of lawn types that require high levels of irrigation.
 - (f) Strive to incorporate existing mature trees and native vegetation into site designs.
 - (g) Minimize the use of landscape equipment powered by fossil fuels.
 - (h) Implement water conservation measures in site/building design and landscaping.

- (i) Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible.

5.5.2 Impact Analysis

Thresholds of Significance

According to the California Natural Resources Agency, “due to the global nature of GHG emissions and their potential effects, GHG emissions will typically be addressed in a cumulative impacts analysis.” According to Appendix G of the CEQA Guidelines, the following criteria may be considered to establish the significance of GCC emissions:

Would the project:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As discussed in Section 15064.4 of the CEQA Guidelines, the determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency, consistent with the provisions in Section 15064. Section 15064.4 further provides that a lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

- (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or
- (2) Rely on a qualitative analysis or performance based standards.

Section 15064.4 also advises a lead agency to consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency

- determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

In December 2015, the City adopted a CAP that outlines the actions that the City will undertake to achieve its proportional share of State GHG emission reductions. The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. In July 2016, the City adopted the CAP Consistency Checklist (Checklist) to provide a streamlined review process for the analysis of potential GHG impacts from proposed new development. The Checklist includes the following three steps to determine CAP consistency:

Step 1: Land Use Consistency

The first step in determining CAP consistency for discretionary development projects is to assess the project's consistency with the growth projections used in the development of the CAP. This section allows the City to determine a project's consistency with the land use assumptions used in the CAP.

Step 2: CAP Strategies Consistency

The second step of the CAP consistency review is to review and evaluate a project's consistency with the applicable strategies and actions of the CAP. Step 2 only applies to development projects that involve permits that would require a certificate of occupancy from the Building Official or projects comprised of one and two family dwellings or townhouses as defined in the California Residential Code and their accessory structures. All other development projects that would not require a certificate of occupancy from the Building Official shall implement Best Management Practices for construction activities as set forth in the Greenbook (for public projects).

Step 3: Project CAP Conformance Evaluation

The third step of the CAP consistency review only applies if Step 1 is answered in the affirmative under option 3. The purpose of this step is to determine whether a project that is located in a Transit Priority Area (TPA) but that includes a land use plan and/or zoning designation amendment that would result in an increase in GHG emissions when compared to the existing designations, is nevertheless consistent with the assumptions in the CAP because it would implement CAP Strategy 3 actions. The following questions must each be answered in the affirmative and fully explained.

Issue 1

Would the proposed project generate greenhouse gas emission, either directly or indirectly, that may have a significant impact on the environment?

Issue 2

Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

Issues 1 and 2 address the following thresholds of significance:

- Generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with the City's Climate Action Plan or another applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gases?

Impact Analysis

The proposed project has been found to be consistent with the Checklist. The following summarizes that determination based on the various items included on the Checklist. A copy of the project's completed Checklist can be found in Appendix P.

Land Use Consistency

1. The project is consistent with the land use designations in the Mission Valley Community Plan and Mission Valley Planned District Ordinance. The Community Plan identifies the project site as Commercial Office use. The PDO identifies the zone for the project site as MV-CO. The project is proposing a Multiple Use Development in accordance with the Community Plan, which allows multiple use development in commercial zones.

CAP Strategies Consistency

STRATEGY 1: ENERGY & WATER EFFICIENT BUILDINGS

1. Cool/Green Roofs – The project will include roofing materials with a minimum three-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under the *California Green Building Standards Code*.
2. Plumbing fixtures and fittings – The project will use low-flow fixtures and appliances that are consistent with the following:

Residential buildings:

- Kitchen faucets will not exceed maximum flow rate of 1.5 gallons per minute at 60 psi;

- Standard dishwashers will not exceed maximum flow rate of 4.25 gallons per cycle;
- Compact dishwashers will not exceed 3.5 gallons per cycle; and
- Clothes washers will not exceed a water factor of 6 gallons per cubic feet drum capacity.

Nonresidential buildings:

- Plumbing fixtures and fittings will not exceed the maximum flow rate specified in Table A5.303.2.3.1 (voluntary measures) of the *California Green Building Standards Code*.
- Appliances and fixtures will meet the provisions of Section A5.303.3 (voluntary measures) of the *California Green Building Standards*.

STRATEGY 2: CLEAN & RENEWABLE ENERGY

3. Clean & Renewable Energy – The project is designed to have an energy budget that shows a 10% improvement when compared to Title 24 (2013), Part 6 Energy Budget for Proposed Design Building as calculated by Compliance Software certified by the California Energy Commission, for both indoor lighting and mechanical systems.

STRATEGY 3: BICYCLE, WALKING, TRANSIT & LAND USE

4. Electric Vehicle Charging – A total of 14 parking spaces (three percent of the total parking spaces required for the project) will be provided with a listed cabinet, box, or enclosure connected to a conduit linking the parking spaces with electrical service in a manner approved by the building and safety official. Of those 14 parking spaces, seven parking spaces (50 percent) will have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use.
5. Bicycle Parking Spaces – The project will provide 140 bicycle parking spaces (including 122 for residential units, plus eight short-term and ten long-term parking spaces for commercial uses), which exceeds the City's Municipal Code (Chapter 14, Article 2, Division 5) of 129 bicycle parking spaces.
6. Shower Facilities – The project will provide one shower stall and two personal effects lockers for office uses in accordance with the voluntary measures under the *California Green Building Standards Code*.
7. Designated Parking Spaces – The project will provide 469 parking spaces. Of those spaces, the project will provide 47 designated spaces (at least ten percent of total parking provided, not including electric vehicle charging stations/parking) as parking designated for a combination of low-emitting, fuel efficient, and carpool/vanpool vehicles.

8. Transportation Demand Management Program – The project may accommodate over 50 tenant-occupants (employees). Therefore, the project will implement a Transportation Demand Management Program. In accordance with the CAP Strategies, the project's Transportation Demand Management Program will provide the following:

- Leases with commercial tenants shall include a requirement to cash-out employees for not using parking.
- Parking spaces for residents shall be leased separate from the rental of apartment homes.
- An employer network in the SANDAG iCommute program shall be established and maintained, promoting SANDAG's RideMatcher online ridematching services to tenants/employees.
- On-site home-work units that support and encourage telework options.
- Access to services that reduce the need to drive, such as cafes, commercial stores, banks, post offices, restaurants, and gyms located within 1,320 feet (1/4 mile) of the project.

There is a third step to the CAP Consistency Checklist, Project CAP Conformance Evaluation. This step is only applicable if the proposed project is not consistent with the existing land use plan and zoning designations, and includes a land use plan and/or zoning designation amendment that would result in an increase in GHG emissions when compared to the existing designations. The Alexan Fashion Valley project is consistent with the existing General Plan and Mission Valley Community Plan land use and zoning designations, as it conforms to the requirements of the Community Plan with regards to the Multiple Use Option. Therefore step 3 of the Checklist is not applicable to this project.

Therefore, the project's incremental contribution to a cumulative GHG emissions effect is determined not to be cumulatively considerable.

Significance of Impacts

The project would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. The proposed project would not result in a significant impact relative to plans, policies, or regulations aimed at reducing GHG emissions. Impacts would therefore be less than significant.

Mitigation Measures

No mitigation is required.

Significance of Impacts Following Implementation of Mitigation Measures

The project would not conflict with the City's CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. The proposed project would not result in a significant impact relative to plans, policies, or regulations aimed at reducing GHG emissions. Impacts would therefore be less than significant. No mitigation is required.

5.6 Energy

In the City of San Diego, energy, in the form of electricity and gas, is provided by San Diego Gas and Electric (SDG&E). Information contained in this section is based on information obtained from SDG&E. Please see Appendix I, *Letters/Responses to Service Providers*, for detailed information provided by SDG&E for the proposed project.

5.6.1 Existing Conditions

Energy is regulated by Title 24, Part 6, of California's Energy Efficiency Standards for Residential and Nonresidential Buildings. The Energy Efficiency Standards for Residential and Nonresidential Buildings were established in 1978 in response to a legislative mandate to reduce California's energy consumption. New standards went into effect in October 2005.

SDG&E, a subsidiary of Sempra Energy, provides natural gas and electricity service to the project site and the City of San Diego as a whole. SDG&E forecasts future natural gas and power consumption demand on a continual basis, primarily for installation of transmission and distribution lines. In situations where projects with large power loads are planned, this is considered together with other loads in the project vicinity, and electrical substations are upgraded as necessary. Direct impacts to electrical and natural gas facilities are addressed and mitigated by SDG&E at the time incoming development projects occur.

Appendix F of the CEQA Guidelines requires that EIRs include a discussion of the potential energy impacts of a proposed project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. According to Appendix F, the means of achieving energy conservation corresponds to decreasing overall per capita energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources.

Electricity. The State of California produces approximately 82 percent of its electricity and imports the remaining 18 percent. The California Independent System Operator (ISO) governs the transmission of electricity from power plants to utilities. Electricity to San Diego County is transferred via 138 kilo volts (kV) lines at Camp Pendleton, and a 500 kV line near Jacumba. Additionally, there are two operating power plants within San Diego County: Encina (Cabrillo Power) - 965 MW, and the Palomar Energy Power Plant, Escondido (SDG&E) - 550 MW that began operating in the summer of 2006.

Electricity distribution lines in the project area are located underground. Each year, SDG&E allocates capital funds for the purposes of converting overhead electric distribution lines. Under provisions of Rule 20A established by the California Public Utilities commission, the City may designate major streets for undergrounding the overhead lines. In general, all new commercial, industrial, and residential developments are required to accept the underground service.

SDG&E has the capacity to meet the present demand for electrical service, and there are no service deficiencies in the existing distribution system (see Appendix I). In addition, a variety of energy conservation programs are provided by SDG&E to City residents and businesses. These programs include:

- Conducting surveys to determine energy use and recommending energy efficiency measures to reduce energy use;
- Providing discounts for retrofitting lighting, refrigeration, and mechanical equipment with energy efficient technologies;
- Incentives for using energy during non-peak hours to reduce peak-hours demand.

Title 24 of the California Administrative Code sets efficiency standards for new construction, regulating energy consumed for heating, cooling, ventilations, water heating, and lighting. These building efficiency standards are enforced through the City's building permit process.

SDG&E facilities surround the project site within public streets. There are existing electric lines undergrounded in Camino de la Reina along the project frontage.

Natural Gas. Natural gas sources for the California include in-state sources (16 percent), Canada (28 percent), the Rockies (10 percent), and the Southwest (46 percent). Gas from outside sources enter the state through large high-pressure gas lines. These transmission lines feed natural gas storage areas located in Orange and northern Los Angeles Counties, which serve all of Southern California. From these storage facilities, high pressure gas transmission lines enter San Diego County from the north inland area (Rainbow area). A 30-inch transmission line veers to the coast, and a 16-inch line continues inland.

According to SDG&E, the current natural gas distribution system is in good operating condition and is adequate to meet the current demand. No improvements are planned at this time.

5.6.2 *Impact Analysis*

Thresholds of Significance

The City of San Diego does not have significant thresholds for Energy, and CEQA Guidelines Appendix G does not contain a specific threshold relative to Energy. However, CEQA Guidelines Appendix F does provide some guidance in evaluating impacts associated with Energy. Based on the guidance provided in CEQA Guidelines Appendix F, for the evaluation of the project's potential impacts on energy, the following threshold will apply:

A project has the potential to have a significant effect on energy if it would generate a demand for energy (electricity and natural gas) that would exceed the planned capacity of energy suppliers.

Issue 1

Would the construction and operation of the proposal result in the use of excessive amounts of electrical power?

Issue 2

Would the proposal result in the use of excessive amounts fuel or other forms of energy (including natural gas, oil, etc.)?

Issues 1 and 2 address the following threshold of significance:

A project has the potential to have a significant effect on energy if it would generate a demand for energy (electricity and natural gas) that would exceed the planned capacity of energy suppliers.

Impact Analysis

The project site has been developed with commercial buildings, surface parking, and landscaping. Therefore, electricity and natural gas facilities exist at the project site to serve the proposed uses.

SDG&E has indicated that the current energy system would be sufficient to service the project, and that SDG&E will serve the project. A letter from SDG&E states SDG&E gas and electric services can be made available for the Alexan Fashion Valley project (see Appendix I). No adverse effects to non-renewable energy resources are anticipated with development of the project site as proposed by the Alexan Fashion Valley project. Furthermore, the project would not result in the use of excessive amounts of fuel or electricity and would not result in the need to develop additional sources of energy.

While energy use at the Alexan Fashion Valley project would not be excessive, the project would incorporate several measures directed at minimizing energy use. These include:

- ENERGYSTAR® Windows and kitchen appliances
- Energy Efficient Air Conditioning and Heating
- 3rd Party Performance Testing and Inspections of Design and Equipment
- Retrofit for Ceiling Fans in all living areas
- Energy Efficient Lighting
- Programmable Thermostats

Significance of Impacts

The project would increase demand for energy in the project area and SDG&E's service area. However, no adverse effects on non-renewable resources are anticipated. The project would follow UBC and Title 24 requirements for energy efficiency and would incorporate sustainable design features directed at reducing energy consumption.

Mitigation Measures

No significant impacts associated with energy would occur. Therefore, no mitigation measures are required.

Significance of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

5.7 Noise

LSA Associates, Inc. prepared a *Noise Impact Analysis* (August 2016), which examines the potential for noise effects of the Alexan Fashion Valley project. The noise analysis is summarized in this section, and the entire report is included as Appendix D of this EIR.

5.7.1 Existing Conditions

Sound is increasing in the environment and can affect quality of life. Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, and sleep.

To the human ear, sound has two significant characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations, or cycles per second, of a wave, resulting in the tone's range from high to low. Loudness is the strength of a sound and describes a noisy or quiet environment; it is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves, combined with the reception characteristics of the human ear. Sound intensity refers to how hard the sound wave strikes an object, which in turn produces the sound's effect. This characteristic of sound can be precisely measured with instruments. The analysis of a project defines the noise environment of the project area in terms of sound intensity and its effect on adjacent sensitive land uses.

MEASUREMENT OF SOUND

Sound intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies. Unlike linear units, such as inches or pounds, decibels (dB) are measured on a logarithmic scale representing points on a sharply rising curve.

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Table 5.7-1, *Common Sound Levels and Their Sources*, provides examples of various typical noise sources, sound levels, and perceived noise from those sources. Sound dissipates exponentially with distance from the noise source. For a single point source, sound levels decrease approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by stationary equipment. If noise is produced by a line source, such as highway traffic or railroad operations, the sound decreases 3 dB for each doubling of distance in a hard site environment. Line source noise, when produced within a relatively flat environment with absorptive vegetation, decreases 4.5 dB for each doubling of distance.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoyance effects of sound. Equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the

predominant rating scales for human communities in the State of California are the L_{eq} and community noise equivalent level (CNEL) or the day-night average level (L_{dn}) based on A-weighted decibels (dBA).

Table 5.7-1. Common Sounds Levels and Their Noise Sources

Noise Source	A-Weighted Sound Level in Decibels	Noise Environments	Subjective Evaluations
Near Jet Engine	140	Deafening	128 times as loud
Civil Defense Siren	130	Threshold of Pain	64 times as loud
Hard Rock Band	120	Threshold of Feeling	32 times as loud
Accelerating Motorcycle at a Few Feet Away	110	Very Loud	16 times as loud
Pile Driver; Noisy Urban Street/Heavy City Traffic	100	Very Loud	8 times as loud
Ambulance Siren; Food Blender	95	Very Loud	
Garbage Disposal	90	Very Loud	4 times as loud
Freight Cars; Living Room Music	85	Loud	
Pneumatic Drill; Vacuum Cleaner	80	Loud	2 times as loud
Busy Restaurant	75	Moderately Loud	
Near Freeway Auto Traffic	70	Moderately Loud	Reference Level
Average Office	60	Quiet	½ as loud
Suburban Street	55	Quiet	
Light Traffic; Soft Radio Music in Apartment	50	Quiet	¼ as loud
Large Transformer	45	Quiet	
Average Residence without Stereo Playing	40	Faint	⅛ as loud
Soft Whisper	30	Faint	
Rustling Leaves	20	Very Faint	
Human Breathing	10	Very Faint	Threshold of Hearing
	0	Very Faint	

Source: Compiled by LSA Associates, Inc. (2004).

CNEL is the time-varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. To 10:00 p.m. (defined as relaxation hours) and 10 dBA weighting factor applied to noise occurring from 10:00 p.m. To 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during the evening hours. CNEL and L_{dn} are within 1 dBA of each other and are normally exchangeable. The noise adjustments are added to the noise events occurring during the more sensitive hours.

Other noise rating scales of importance when assessing the annoyance factor include the maximum noise level (L_{max}), which is the highest exponential time-averaged sound level that occurs during a stated time period. The noise environments discussed in this analysis are specified in terms of maximum levels denoted by L_{max} for short-term noise impacts. L_{max} reflects peak operating conditions and addresses the annoyance aspects of intermittent noise.

Noise impacts can be described in three categories. The first is audible impacts, which refers to increases in noise levels noticeable to humans. Audible increases in noise levels generally refer to a change of 3 dB or greater, since this level has been found to be barely perceptible in exterior environments. The second category, potentially audible, refers to a change in the noise level between 1 dB and 3 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category is changes in noise level of less than 1 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant.

SENSITIVE RECEPTORS

Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to noise. There are no existing noise-sensitive uses located in the immediate vicinity of the project site. The closest noise-sensitive receivers are condominiums to the northeast across SR-163 and hotels to the southwest beyond I-8. There are commercial uses to the west of the project site across Camino De La Reina, to the north across Riverwalk Drive beyond the San Diego River, and to the east across SR-163.

EXISTING NOISE ENVIRONMENT

An ambient noise survey was conducted on the project site near the western boundary along Hotel Circle, at the southern end and northern end of the project site, on July 31, 2015. Another ambient noise measurement was conducted near the northeastern project boundary along Camino De La Reina and SR-163. Table 5.7-2, *Short-Term Ambient Noise Monitoring Results*, lists the short-term noise monitoring results. Table 5.7-3, *Physical Location of Noise Level Measurements*, describes the physical location of the noise measurement locations. Ambient noise sources in the project area include vehicular traffic on local streets and State highway. As shown in Table 5.7-2, ambient traffic noise level ranges from 61.7 dBA at Site 2 (where it is farthest from SR-163) to 68.2 dBA at Site 3 (where it is closest to SR-163). Figure 5.7-1, *Noise Monitoring Locations*, depicts these noise monitoring locations.

Table 5.7-2. Short Term Ambient Noise Monitoring Results

Monitor No.	Date	Start Time	Duration	dBA L _{eq}
M-1	7/31/2015	10:18 AM	20 minutes	66.2
M-2	7/31/2015	10:51 AM	20 minutes	61.7
M-3	7/31/2015	11:33 PM	20 minutes	68.2

Source: LSA Associates, Inc. (August 2015).

dBA = A-weighted decibels

L_{eq} = equivalent continuous noise level

Table 5.7-3. Physical Location of Noise Level Measurements

Monitor No.	Location Description	Noise Sources
M-1	Southern project boundary along Hotel Circle	<ul style="list-style-type: none"> Traffic on SR-163, Camino De La Reina, and I-8 5 cars entering the driveway to the project site Project site about at grade with Hotel Circle
M-2	Northwestern project boundary along Hotel Circle and Camino De La Reina; meter is 11 ft from edge of street	<ul style="list-style-type: none"> Traffic on Camino De La Reina and SR-163 Project site is approximately 6 ft above Camino De La Reina and Hotel Circle
M-3	The northeastern project boundary along Camino De La Reina	<ul style="list-style-type: none"> Traffic on SR-163 and Camino De La Reina SR-163 is approximately 12 ft above the project site, which is approximately 3–4 ft above Camino De La Reina

Source: LSA Associates, Inc. (August 2015).

ft = feet

I-8 = Interstate 8

SR-163 = State Route 163

Existing Traffic Noise

The primary existing noise sources in the project area are transportation facilities. Traffic on Cabrillo Freeway/SR-163, Camino De La Reina, Hotel Circle, and Riverwalk Drive in the project vicinity is the source of ambient noise. The existing (2015) ADT volumes for roadway segments in the project vicinity are obtained from the Focused Traffic Impact Analysis prepared for the proposed project (Urban Systems Associates, Inc., April 13, 2016). The ADT volumes for SR-163 and I-8 in the project area were obtained from the California Department of Transportation (Caltrans) website for the existing (2015) condition. These freeway traffic volumes were then projected to the opening year (2018) conditions, assuming a one percent annual growth along freeway segments in the project vicinity.

Existing Airport Noise

The San Diego International Airport is located southwest of the project site. Based on the San Diego International Airport Part 150 Update, Noise Exposure Maps, the project site is located in an area outside the 60 dBA CNEL contours projected for 2014. (See Figure 5.7-2, *San Diego International Airport – Noise Contour Map*.)

The Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA RD-77-108) was used to evaluate highway traffic-related noise conditions in the vicinity of the project site. This model requires various parameters including traffic volumes, vehicle mix, vehicle speed, and roadway geometry to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resultant noise levels are weighted and summed over 24-hour periods to determine the CNEL values.

Table 5.7-4, Existing Traffic Noise Levels provides the existing (2015) traffic noise levels adjacent to roadway segments in the project vicinity. These noise levels represent worst-case scenarios, which assume that no shielding is provided between the traffic and the location where the noise contours are drawn. Traffic noise is generally moderate to high along existing street segments in the project vicinity and is high on SR-163 and I-8.

Table 5.7-4. Existing Traffic Noise Levels

Roadway Segment	ADT	Centerline to 70 CNEL (ft)	Centerline to 65 CNEL (ft)	Centerline to 60 CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane
Camino De La Reina from Hotel Circle North/South to Project Driveways	8,900	< 50	60	130	65.5
Camino De La Reina from Project Driveways to Avenida Del Rio	8,900	< 50	60	130	65.5
Camino De La Reina from Avenida Del Rio to Camino De La Siesta	13,700	< 50	80	173	67.4
I-8 Freeway	209,200	483	1,037	2,233	81.8
SR-163 Freeway	148,000	409	878	1,890	80.8

Source: Urban System Associates, Inc. (April 13, 2016), and LSA Associates, Inc. (May 2016).

Note: Traffic noise within 50 ft of the roadway centerline should be evaluated with site-specific information. Noise modeling performed using San Diego County traffic mix. I-8 and SR-163 traffic data from Caltrans for 2013.

ADT = Average Daily Traffic

CNEL = Community Noise Equivalent Level

dBA = A-weighted decibels

EB = eastbound

ft = feet

I-8 = Interstate 8

SR-163 = State Route 163

WB = westbound

5.7.2 Impact Analysis

NOISE STANDARDS

A project will normally have a significant noise-related effect on the environment if it will substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of the community in which it is located. The applicable noise standards governing the project site are the criteria in the City's General Plan Noise Element, City of San Diego CEQA Significance Determination Thresholds and San Diego Municipal Code, Chapter 5, Article 9.5: Noise Abatement and Control.

City of San Diego General Plan

The City of San Diego requires new projects to meet exterior noise level standards as established in the Noise Element of the General Plan [City of San Diego 2008: Policy NE-A.2]. The Noise Compatibility Guidelines are presented in Table 5.7-5, *Noise Compatibility Guidelines*.

Table 5.7-5. City of San Diego Noise Compatibility Guidelines

Land Use Category		Exterior Noise Exposure (dBA CNEL)			
		60	65	70	75
<i>Parks and Recreational</i>					
Parks, Active and Passive Recreation					
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
<i>Agricultural</i>					
Crop Raising & Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables					
<i>Residential</i>					
Single Dwelling Units; Mobile Homes		45			
Multiple Dwelling Units <i>*For uses affected by aircraft noise, refer to Policies NE-D.2. & NE-D.3.</i>		45	45*		
<i>Institutional</i>					
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Child Care Facilities		45			
Other Educational Facilities including Vocational/Trade Schools and Colleges and Universities		45	45		
Cemeteries					
<i>Retail Sales</i>					
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries Pharmaceutical, & Convenience Sales; Wearing Apparel & Accessories			50	50	
<i>Commercial Services</i>					
Building Services; Business Support; Eating & Drinking; Financial Institutions; Maintenance & Repair; Personal Services; Assembly & Entertainment (includes public and religious assembly); Radio & Television Studios; Golf Course Support			50	50	
Visitor Accommodations		45	45	45	
<i>Offices</i>					
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters			50	50	
<i>Vehicle and Vehicular Equipment Sales and Services Use</i>					
Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking					
<i>Wholesale, Distribution, Storage Use Category</i>					
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution					
<i>Industrial</i>					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries					
Research & Development				50	
	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level. Refer to Section I.		
		Outdoor Uses	Activities associated with the land use may be carried out.		
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas. Refer to Section I.		
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable. Refer to Section I.		
	Incompatible	Indoor Uses	New construction should not be undertaken.		
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.		

Sound levels up to 60 dBA CNEL are considered Compatible with outdoor areas of frequent use (patios, balconies, parks, swimming pools, etc.) in the Visitor Accommodations land use category; sound levels up to 75 dBA CNEL are considered Conditionally Compatible. The building structure must attenuate exterior noise in habitable rooms to 45 dBA CNEL or below.

Sound levels up to 65 dBA CNEL are considered Compatible with outdoor areas of frequent use in the Offices land use category; sound levels up to 75 dBA CNEL are considered Conditionally Compatible. The building structure must attenuate exterior noise in offices to 50 dBA CNEL or below.

Thresholds of Significance

CITY OF SAN DIEGO CEQA SIGNIFICANCE THRESHOLDS

The City's CEQA Significance Determination Thresholds addresses traffic noise, as specified in Table K-2: Traffic Noise Significance Thresholds (dB(A) CNEL). Relevant portions are reproduced in Table 5.7-6, *City of San Diego Traffic Noise Significance Thresholds*.

CITY OF SAN DIEGO NOISE ABATEMENT AND CONTROL ORDINANCE

The City of San Diego Municipal Code, Chapter 5, Article 9.5, Noise Abatement and Control, governs stationary sources and operational noise. The applicable sound level is a function of the time of day and land use zone. Sound levels are measured at the property line of the noise source. As stated in the City's Noise Abatement and Control ordinance:

It shall be unlawful for any person to cause noise by any means to the extent that the one-hour average sound level exceeds the applicable limit [shown in Table 5.7-6, *Applicable Noise Limits*] at any location in the City of San Diego on or beyond the boundaries of the property on which the noise is produced. The noise subject to these limits is that part of the total noise at the specified location that is due solely to the action of said person.

Table 5.7-6 *Applicable Noise Limits*, summarizes the applicable hourly noise limits for various receiving land uses. For the proposed project, the multifamily dwellings are subject to the noise standards of 55 dBA $L_{eq}(1)$ from 7:00 a.m. to 7:00 p.m., 50 dBA $L_{eq}(1)$ from 7:00 p.m. to 10:00 p.m., and 45 dBA $L_{eq}(1)$ from 10:00 p.m. to 7:00 a.m. The commercial/retail uses are subject to the noise standards of 65 dBA $L_{eq}(1)$ from 7:00 a.m. to 7:00 p.m., 60 dBA $L_{eq}(1)$ from 7:00 p.m. to 10:00 p.m., and 60 dBA $L_{eq}(1)$ from 10:00 p.m. to 7:00 a.m.

Table 5.7-6. Applicable Noise Limits

Zone	Time	1-Hour Average Sound Level, dBA $L_{eq}(1)$
Single-Family Residential	7:00 a.m.–7:00 p.m.	50
	7:00 p.m.–10:00 p.m.	45
	10:00 p.m.–7:00 a.m.	40
Multifamily Residential (up to a maximum density of 1/2000)	7:00 a.m.–7:00 p.m.	55
	7:00 p.m.–10:00 p.m.	50
	10:00 p.m.–7:00 a.m.	45
All other Residential	7:00 a.m.–7:00 p.m.	60
	7:00 p.m.–10:00 p.m.	55
	10:00 p.m.–7:00 a.m.	Zone
Commercial	7:00 a.m.–7:00 p.m.	65
	7:00 p.m.–10:00 p.m.	60
	10:00 p.m.–7:00 a.m.	60
Industrial or Agricultural	Anytime	75

Source: City of San Diego Municipal Code, Chapter 5, Article 9.5: Noise Abatement and Control.

dBA = A-weighted decibels

$L_{eq}(1)$ = equivalent continuous noise level over 1 hour

Thresholds for temporary construction noise are as follows:

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

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

CALIFORNIA BUILDING CODE

Title 24 CCR, also referred to as the California Building Code, requires that interior noise levels in multifamily residences caused by exterior sources not exceed 45 dBA CNEL. This is also considered a desirable noise exposure standard for single-family residences. Title 24 CCR further specifies that if exterior noise levels exceed 60 dBA CNEL for multifamily residential uses, an acoustical analysis shall be required to demonstrate that the design would achieve the prescribed interior noise standard. The noise level of 65 dBA CNEL is also the threshold where noise interferes noticeably with the

ability to carry on a quiet conversation. Therefore, exterior noise exposure of 65 dBA CNEL is the most common noise/land use compatibility guideline for new residential construction in California.

STATE OF CALIFORNIA

California Code of Regulations, Title 24: Noise Insulation Standards requires an acoustical analysis for hotels and multi-family dwellings located in an area exceeding 60 dBA CNEL. The analysis must show that the proposed design would limit interior noise in habitable rooms to 45 dBA CNEL or below.

The interior noise analysis should identify sound transmission loss requirements for building elements exposed to exterior noise levels exceeding 60 dBA CNEL. If the interior 45 dBA CNEL limit can be achieved only with the windows closed, the residence design must include mechanical ventilation that meets applicable CBC requirements. Worst-case noise levels, either existing or future, must be used. Future noise level predictions must be for a date at least 10 years from the time of the building permit application.

Issue 1

Would the proposal result or create a significant increase in the existing ambient noise levels?

Issue 1 addresses the following significance thresholds:

- The generation of noise for certain types of land uses could cause potential land use incompatibility. A project which would generate noise levels at the property line which exceed section 59.5.0401 of the City's Municipal Code is considered potentially significant, as identified in Table 5.7-6, *Applicable Noise Limits*.
- The City's Significance Thresholds for determining interior and exterior noise impacts from traffic-generated noise are presented in table K-2 of the City's CEQA Significance Determination Thresholds.

Impact Analysis

CONSTRUCTION NOISE

Short-term noise impacts would be associated with excavation, grading, and erecting of buildings on site during construction of the proposed project. Construction-related, short-term noise levels would be higher than existing ambient noise levels in the project area today but would no longer occur once construction of the project is completed.

Two types of short-term noise impacts could occur during the construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the site for the proposed project would incrementally increase noise levels on access roads leading to the site. There will be a relatively high single-event noise exposure potential at a maximum level of 87 dBA L_{max} with trucks passing at 50 feet (ft). However, the projected construction traffic will be

small when compared to the existing traffic volumes on Camino De La Reina, SR-163, and I-8, and its associated noise level change over an hour or a day will not be perceptible. Therefore, short-term construction-related worker commutes and equipment transport noise impacts would not be significant.

The second type of short-term noise impact is related to noise generated during excavation, grading, and construction on the project site. Construction is performed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 5.7-7, *Default Noise Emission Reference Levels and Usage Factors*, lists maximum noise levels recommended for noise impact assessments for typical construction equipment based on a distance of 50 ft. between the equipment and a noise receptor, taken from the FHWA Roadway Construction Noise Model (FHWA 2006). Typical maximum composite noise levels range up to 90 dBA L_{max} at 50 ft. during the noisiest construction phases. The site preparation phase, which includes excavation and grading of the site, tends to generate the highest noise levels, because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery such as backfillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three or four minutes at lower power settings.

Construction of the proposed project is expected to require the use of scrapers, bulldozers, and water and pickup trucks. This equipment would be used on site. Based on Table 5.7-7, the maximum noise level generated by each scraper on the proposed project site is assumed to be 84 dBA L_{max} at 50 ft. from the scraper. Each bulldozer would also generate 82 dBA L_{max} at 50 ft. The maximum noise level generated by water and pickup trucks is approximately 76 dBA L_{max} at 50 ft. from these vehicles.

Each doubling of a sound source with equal strength increases the noise level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, the worst-case combined noise level at each individual residence during this phase of construction would be 90 dBA L_{max} at a distance of 50 ft. from the active construction area.

Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to noise. There are no existing noise-sensitive uses located in the immediate vicinity of the project site. The closest noise-sensitive receivers are condominiums to the northeast across SR-163 and hotels to the southwest beyond I-8. There are commercial uses to the west of the project site across Hotel Circle, to the north across Riverwalk Drive beyond the San Diego River, and to the east across SR-163. There are freeway traffic and intervening structures between these receptors and the project

Table 5.7-7. Default Noise Emission Reference Levels and Usage Factors

Equipment Description	Impact Device?	Acoustical Usage Factor	Spec. 721.560 L_{\max} at 50 ft (dBA, slow)	Actual Measured L_{\max} at 50 ft (dBA, slow)	No. of Actual Data Samples (Count)
Auger Drill Rig	No	20	85	84	36
Backhoe	No	40	80	78	372
Blasting	Yes	N/A	94	N/A	0
Chain Saw	No	20	85	84	46
Compactor (ground)	No	20	80	83	57
Compressor (air)	No	40	80	78	18
Concrete Mixer Truck	No	40	85	79	40
Crane	No	16	85	81	405
Dozer	No	40	85	82	55
Dump Truck	No	40	84	76	31
Excavator	No	40	85	81	170
Flat Bed Truck	No	40	84	74	4
Front End Loader	No	40	80	79	96
Generator	No	50	82	81	19
Generator (< 25 kVA, VMS Signs)	No	50	70	73	74
Grader	No	40	85	N/A	0
Jackhammer	Yes	20	85	89	133
Paver	No	50	85	77	9
Pickup Truck	No	40	55	75	1
Pneumatic Tools	No	50	85	85	90
Pumps	No	50	77	81	17
Refrigerator Unit	No	100	82	73	3
Rock Drill	No	20	85	81	3
Roller	No	20	85	80	16
Sand Blasting (single nozzle)	No	20	85	96	9
Scraper	No	40	85	84	12
Tractor	No	40	84	N/A	0
Vacuum Excavator (Vac-Truck)	No	40	85	85	149
Vibratory Concrete Mixer	No	20	80	80	1
Vibratory Pile Driver	No	20	95	101	44
Warning Horn	No	5	85	83	12
Welder/Torch	No	40	73	74	5

Source: *Highway Construction Noise Handbook* (FHWA 2006).

dBA = A-weighted decibels

FHWA = Federal Highway Administration

ft = foot/feet

kVA = kilovolt-amperes

 L_{\max} = maximum instantaneous noise level

N/A = Not Applicable

RCNM = Roadway Construction Noise Model

VMS = variable message sign

site. These closest noise-sensitive receptors would not be subject to short-term noise exceeding 70 dBA L_{max} that is generated by traffic on these freeways near the project boundary. In addition, this range of maximum construction noise would occur only intermittently when construction activity occurs near the project's boundary, and it would not exceed the 75 dBA L_{eq}(1) noise standard over a one-hour period for construction noise.

Construction activity would occur during allowable times and generate sound levels below 75 dBA L_{eq} (12 hours), in compliance with Section 59.5.404 of the City of San Diego Municipal Code. The project is expected to comply with the City of San Diego 75 dBA L_{eq} (12 hour) Municipal Code noise limit. The project's construction phase impacts would not exceed the City's construction noise ordinances and would be considered less than significant.

TRAFFIC NOISE IMPACT

The primary existing noise sources in the project area are transportation facilities. Traffic on local streets in the project vicinity is the source of ambient noise. The 2015 and opening year (2018) ADT volumes for roadway segments in the project vicinity are obtained from the Focused Traffic Impact Analysis prepared for the proposed project (Urban Systems Associates, Inc., April 13, 2016) and the Caltrans website. The freeway traffic volumes were then projected to the future opening year (2018) conditions, assuming a one percent annual growth along roadway segments in the project vicinity.

Guidelines provided in the FHWA Highway Traffic Noise Prediction Model (FHWA RD-77-108) were used to evaluate highway traffic-related noise conditions in the vicinity of the project site. Tables 5.7-8 and 5.7-9 provide the existing (2015) and opening year (2018) traffic noise levels for the without and with project scenarios along roadway segments in the project vicinity. These noise levels represent worst-case scenarios, which assume that no shielding is provided between the traffic and the location where the noise contours are drawn. Traffic noise is to be low to moderate along street segments in the project vicinity.

Potential Off-site Noise Impacts

As a rule of thumb, a doubling of the traffic volumes would increase the traffic noise level by 3 dBA. Based on traffic volumes presented in Tables 5.7-8 and 5.7-9 and the number of daily vehicle trips generated by the proposed project, project-related traffic volumes would add 0.3 dBA or less on these roadways adjacent to the project site. Therefore, project-related traffic noise level increases would be less than a 3 dBA increase along roadway segments in the project vicinity. This range of traffic noise level increases is not perceptible by the human ear in an outdoor environment. In addition, traffic noise levels along roadway segments in the project vicinity would continue to remain moderate to high. Therefore, no significant project-related traffic noise impacts would occur for offsite land uses in the project vicinity. The proposed project would not result in significant traffic noise impacts on the environment surrounding the project site and its vicinity.

Table 5.7-8. Existing (2015) Traffic Noise Levels Without and With Project

Roadway Segment	Existing (2015) Without Project					Existing (2015) With Project						
	ADT	Centerline to 70 CNEL (ft)	Centerline to 65 CNEL (ft)	Centerline to 60 CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	ADT	Change in ADT	Centerline to 70 CNEL (ft)	Centerline to 65 CNEL (ft)	Centerline to 60 CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	Increase over Existing CNEL (dBA) 50 ft from Centerline of Outermost Lane
Camino De La Reina from Hotel Circle North/South to Project Driveways	8,900	< 50	60	130	65.5	9,500	600	< 50	63	135	65.8	0.3
Camino De La Reina from Project Driveways to Avenida Del Rio	8,900	< 50	60	130	65.5	9,100	200	< 50	61	131	65.6	0.1
Camino De La Reina from Avenida Del Rio to Camino De La Siesta	13,700	< 50	80	173	67.4	13,800	100	< 50	81	173	67.4	0
I-8 Freeway	209,200	483	1,037	2,233	81.8	209,200	0	483	1,037	2,218	81.8	0
SR-163 Freeway	148,000	409	878	1,890	80.8	148,000	0	409	878	1,877	80.7	0

Source: Urban Systems Associates, Inc., (April 13, 2016), Compiled by LSA Associates, Inc. (May 2016).
Note: Traffic noise within 50 ft of the roadway centerline should be evaluated with site-specific information. Noise modeling performed using San Diego County traffic mix. I-8 and SR-163 traffic data from Caltrans for 2013.
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
EB = eastbound
ft = feet
I-8 = Interstate 8
SR-163 = State Route 163
WB = westbound

Table 5.7-9. Opening Year (2018) Traffic Noise Levels Without and With Project

Roadway Segment	Opening Year (2018) Without Project					Opening Year (2018) With Project						
	ADT	Centerline to 70 CNEL (ft)	Centerline to 65 CNEL (ft)	Centerline to 60 CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	ADT	Change in ADT	Centerline to 70 CNEL (ft)	Centerline to 65 CNEL (ft)	Centerline to 60 CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	Increase over Existing CNEL (dBA) 50 ft from Centerline of Outermost Lane
Camino De La Reina from Hotel Circle North/South to Project Driveways	10,600	< 50	68	145	66.3	11,100	500	< 50	70	150	66.5	0.2
Camino De La Reina from Project Driveways to Avenida Del Rio	10,100	< 50	66	141	66.0	10,300	200	< 50	66	143	66.1	0.1
Camino De La Reina from Avenida Del Rio to Camino De La Siesta	16,300	< 50	90	194	68.1	16,500	200	< 50	91	195	68.2	0.1
I-8 Freeway	213,400	489	1,051	2,263	81.9	213,400	0	489	1,051	2,263	81.9	0.0
SR-163 Freeway	150,900	414	889	1,914	80.8	150,900	0	414	889	1,914	80.8	0.0

Source: Urban Systems Associates, Inc. (April 13, 2016), Compiled by LSA Associates, Inc. (May 2016).
Note: Traffic noise within 50 ft of the roadway centerline should be evaluated with site-specific information. Noise modeling performed using San Diego County traffic mix. I-8 and SR-163 traffic data from Caltrans for 2013.
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
EB = eastbound
ft = feet
I-8 = Interstate 8
SR-163 = State Route 163
WB = westbound

Potential On-Site Noise Impacts

The project proposes outdoor active use areas, such as patios and balconies, that could be potentially impacted by exterior noise levels exceeding the 65 dBA CNEL noise standard. However, implementation of project design features as presented below that would avoid dwelling units exposed to traffic noise level above 65 dBA CNEL to have any outdoor active use areas such as balconies along and directly facing SR-163 would ensure that the proposed project is consistent with the City's General Plan land use policies regarding noise.

Receivers along the North-South Leg of Camino De La Reina. Based on the preliminary site plan, except for portions of the proposed retail, office, and leasing office buildings, none of the proposed residential units along the north-south leg of Camino de la Reina would have their outdoor living areas within this noise impact zone. Therefore, the proposed land uses are consistent with the City's General Plan, and no impact would result.

Receivers along East-West Leg of Camino De La Reina., Any outdoor active use areas proposed along the northern boundary of the project site along the east-west leg of Camino De La Reina that are within 91 feet of the roadway centerline would be potentially exposed to exterior noise levels higher than 65 dBA CNEL exceeding the City's noise standard for noise-sensitive uses. However, none of the proposed residential units would have their outdoor living areas within this noise impact zone. Therefore, the proposed land uses are consistent with the City's General Plan and no impacts would result.

Receivers along SR-163 and I-8. Outdoor active use areas on the eastern and southern portions of the project site along SR-163 that are within 889 feet of the SR-163 centerline would be exposed to exterior noise levels higher than 65 dBA CNEL. The eastern portion of the proposed development is approximately 150 feet from the centerline of SR-163 and would potentially be exposed to traffic noise levels reaching 77 dBA CNEL. This portion of the project site is also potentially exposed to traffic noise level exceeding 65 dBA CNEL for areas within 1,051 feet of the I-8 centerline. Since the project site is approximately 700 feet (southern portion) to 1,200 feet (northern portion) from the I-8 centerline, the contribution of I-8 traffic noise to the on-site noise levels would range from 68 dBA CNEL to the southern portion (retail/office) to 64 dBA CNEL to the northern portion (residential uses) when no intervening structural shielding is considered. Assuming a worst-case scenario that no structural shielding is provided for the I-8 traffic to the project site, contribution of the I-8 traffic noise level to the project site would result in a combined ground-floor exterior noise level of 77.5 dBA CNEL on the southern portion and 77.2 dBA CNEL on the northern portion of the project site. Because there are no outdoor living/dining areas associated with the proposed retail and/or office building on the southern portion of the project site that are within the impact zone of the SR-163/I-8 traffic, these proposed commercial land uses would be consistent with the City's General Plan land use policies regarding noise, and no impacts would result.

The multifamily dwelling units with outdoor living areas (patios and balconies) facing east or south that would be directly exposed to traffic on SR-163/I-8 would experience traffic noise levels exceeding the City's 65 dBA CNEL exterior noise standard for residential uses without any noise attenuation schemes implemented. However, SR-163 is approximately 12 feet higher in elevation than the building pad on the project site in this portion of the project site. The elevation difference functions as a noise barrier for the ground-floor receivers in their patios or other noise-sensitive use areas. It is estimated that the elevation difference would provide a minimum of 12 dBA in noise reduction for the ground-floor receivers at these dwelling units. Therefore, exterior noise level would be reduced to 65 dBA CNEL or lower for the ground-floor receivers, and they would be consistent with the City's General Plan land use policies regarding noise.

For upper level receivers, the multifamily dwelling units with outdoor living areas (patios and balconies) facing east or south that would be directly exposed to traffic on SR-163/I-8 it is estimated the receivers would not benefit as much from the edge of freeway shielding with only a portion of the reductions received by the ground-floor receivers. However, there are no balconies associated with dwelling units on the upper floors of the building that are directly adjacent to the SR-163/I-8 traffic noise. Therefore, no significant traffic noise impact would occur and no mitigation measures are required.

Implementation of these project design features would avoid significant impacts for these units. Title 24 CCR—known as the California Building Code—contains standards for allowable interior noise levels associated with exterior noise sources (California Building Code 1998). The standards apply to new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family residences. The California Building Code standards state that:

Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the Day-Night Average Sound Level (Ldn) or the Community Noise Equivalent Level (CNEL), consistent with the noise element of the local general plan. Worst-case noise levels, either existing or future, shall be used as the basis for determining compliance with [these standards]. Future noise levels shall be predicted for a period of at least 10 years from the time of building permit application.

Based on United States EPA Protective Noise Levels (EPA 1978), with windows or doors open, interior noise levels at the interior spaces of the dwelling units with bedrooms and/or living rooms fronting the streets would potentially exceed the 45 dBA CNEL (i.e., 70 dBA - 12 dBA = 58 dBA) interior noise standard. With windows closed, interior noise levels in the interior spaces of the dwelling units with bedrooms and/or living rooms fronting the streets would also exceed the 45 dBA CNEL (70 dBA - 24 dBA = 46 dBA) standard for noise-sensitive uses.

Windows with STC ratings higher than those provided by standard building construction (STC-24 to STC-28) would be implemented as part of the project design features for these dwelling units adjacent to the SR-163. In addition, air conditioning, a form of mechanical ventilation, would be installed for dwelling units directly exposed to traffic noise. Because the proposed project would provide air conditioning as a standard feature, and windows with STC ratings sufficient to provide building exterior-to-interior noise attenuation would be implemented for the building facade exposed to exterior noise exceeding 69 dBA CNEL (thereby achieving the goal of meeting the 45 dBA CNEL interior noise standard identified in the City's General Plan), the proposed project would be consistent with the General Plan land use policies regarding noise. Table 5.7-10, *Minimum STC Ratings for Window at Bedrooms and Living Rooms*, lists the projected exterior noise levels and the minimum STC ratings recommended for windows associated with bedrooms and living rooms in the respective areas. It should be noted that the south-facing interior dwelling units (i.e., second row dwelling units from the north along SR-163) with direct line-of-sight to traffic on SR-163/I-6 are also recommended to have windows upgrade as shown in Table 5.7-10 for the front-row dwelling units, due to traffic noise coming through the opening to the east. For other interior dwelling units, due to the limited direct exposure to traffic noise from SR-163, with the front row dwelling units functioning as noise barriers providing at least 5 dBA in noise reduction when the line of sight is blocked, traffic noise levels would be reduced to 65 dBA or lower and they would be consistent with the City's General Plan land use policies regarding noise.

Table 5.7-10. Minimum STC Ratings for Windows at Bedrooms and Living Rooms

Street	Floor	Exterior Noise Level (dBA CNEL)	Minimum STC Rating
Camino de la Reina, North-South Leg	Ground Floor	64 ¹	STC-24
	Second Floor	64	STC-24
	Third Floor and Above	64	STC-24
Camino De La Reina East-West Leg	Ground Floor	64 ²	STC-24
	Second Floor	64	STC-24
	Third Floor and Above	64	STC-24
SR-163/I-8	Ground Floor	65 ³	STC-28
	Second Floor	77 ⁴	STC-36
	Third Floor and Above	77	STC-36

Source: LSA Associates, Inc. (August 2015).

¹ West-facing along Hotel Circle.

² West-facing along Camino De La Reina.

³ East-facing/south-facing along SR-163.

⁴ Include second-row-from-north along SR-163 that are south-facing interior dwelling units.

CNEL = Community Noise Equivalent Level

dBA = A-weighted decibels

I-8 = Interstate 8

SR-163 = State Route 163

STC = sound transmission class

As a rule of thumb, it takes a doubling of the noise source strength to increase the noise level by 3 dBA. In addition to structures that would include future residential units, office space, and retail use, the project proposes an outdoor courtyard which would be open to traffic noise from SR-163.

Residential units that open on to that courtyard would also be exposed to vehicular noise from traffic on SR-163. The interior dwelling units would be exposed to only a small segment of the traffic on SR-163, and the estimated traffic noise level inside this opening in the courtyard would be lower than those that are directly exposed to a much larger segment of SR-163. Noise reduction due to the limited exposure could result in a reduction of 5 dBA or more since the reduction in the number of vehicles on SR-163 would be high and only a small portion of the total traffic volume would be accounted for the traffic noise exposure inside the opening in the courtyard. Even with the reflected traffic noise inside from the opening in the courtyard, which would be a small portion of the traffic noise energy entering this opening, the estimated increase in traffic noise as a result of reflection would be less than 1 dBA and would be more than offset by the shielding reduction provided by the front row dwelling units, which would be 5 dBA or more. Therefore, any “echoing effect” through the opening in the courtyard associated with the residential building would not result in substantial noise effects.

Significance of Impacts

CONSTRUCTION

No construction impact would result. No mitigation would be required.

TRAFFIC

Dwelling units fronting SR-163 (and I-8) and Camino De La Reina would be exposed to exterior noise levels exceeding 65 dBA CNEL. Project design features would be implemented to comply with the California Building Code, Title 24, Section 1208A requirements for interior noise in habitable rooms and would reduce noise levels to comply with City requirements for interior noise levels. Air conditioning, a form of mechanical ventilation, would be implemented for all on-site dwelling units to ensure that windows can remain closed for prolonged periods of time. Windows with STC ratings higher than those provided by standard building construction (STC-24 to STC-28) would be implemented for bedrooms and living rooms along and directly exposed to traffic on SR-163 and/or Camino De La Reina to comply with the City's requirements for interior noise levels.

The project does not create a direct impact of more than 3 dBA CNEL on any roadway segment. Therefore, the project's direct contributions to off-site roadway noise increases would not cause any significant impacts to any existing or future noise sensitive land uses. No mitigation is required.

Mitigation Measures

No mitigation measures are required.

Significant of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

Issue 2

Would the proposal result in exposure of people to noise levels created by the project which exceed the City's adopted noise ordinance and/or City's Significance Determination Thresholds?

Issue 2 addresses the following significance thresholds:

- The generation of noise for certain types of land uses could cause potential land use incompatibility. A project which would generate noise levels at the property line which exceed section 59.5.0401 of the City's Municipal Code is considered potentially significant, as identified in Table 5.7-6, *Applicable Noise Limits*.
- The City's Significance Thresholds for determining interior and exterior noise impacts from traffic-generated noise are presented in table K-2 of the City's CEQA Significance Determination Thresholds.

Impact Analysis

As evaluated under *Issue 1*, the project does not create a direct impact of more than 3 dBA CNEL on any roadway segment. The project would not cause exposure of people to current or future transportation noise levels which exceed standards established in the Transportation Element of the General Plan. Therefore, no significant noise impacts would result.

While the project site is located within the AIA of the SDIA, the airport is seven miles southwest of the project site. Thus the project site is not located near the San Diego International Airport. Aircraft activities contribute very little to the ambient noise levels in the project vicinity. The project site is not located near the San Diego International Airport. Aircraft activities contribute very little to the ambient noise levels in the project vicinity. Based on the noise contour map in the San Diego International Airport Land Use Compatibility Plan (San Diego County Regional Airport Authority 2014), the project site is located in an area outside the 60 dBA CNEL contours.

The project proposes residential, retail and office uses. As shown in Table 5.7-5 *City of San Diego Noise Compatibility Chart*, the project is compatible with noise levels of 60 to 65 dB CNEL. Therefore, the project would be compatible with the ALUCP noise regulations, and no impacts would result due to aircraft noise from operations.

Significance of Impacts

The project would not cause exposure of people to current or future transportation noise levels which exceed standards established in the Transportation Element of the General Plan. Therefore, no significant noise impacts would result.

Mitigation Measures

The proposed project would not result in significant noise impacts. No mitigation measures are required.

Significance of Impacts Following Implementation of Mitigation Measures

The proposed project would not result in significant noise impacts. No mitigation measures are required.

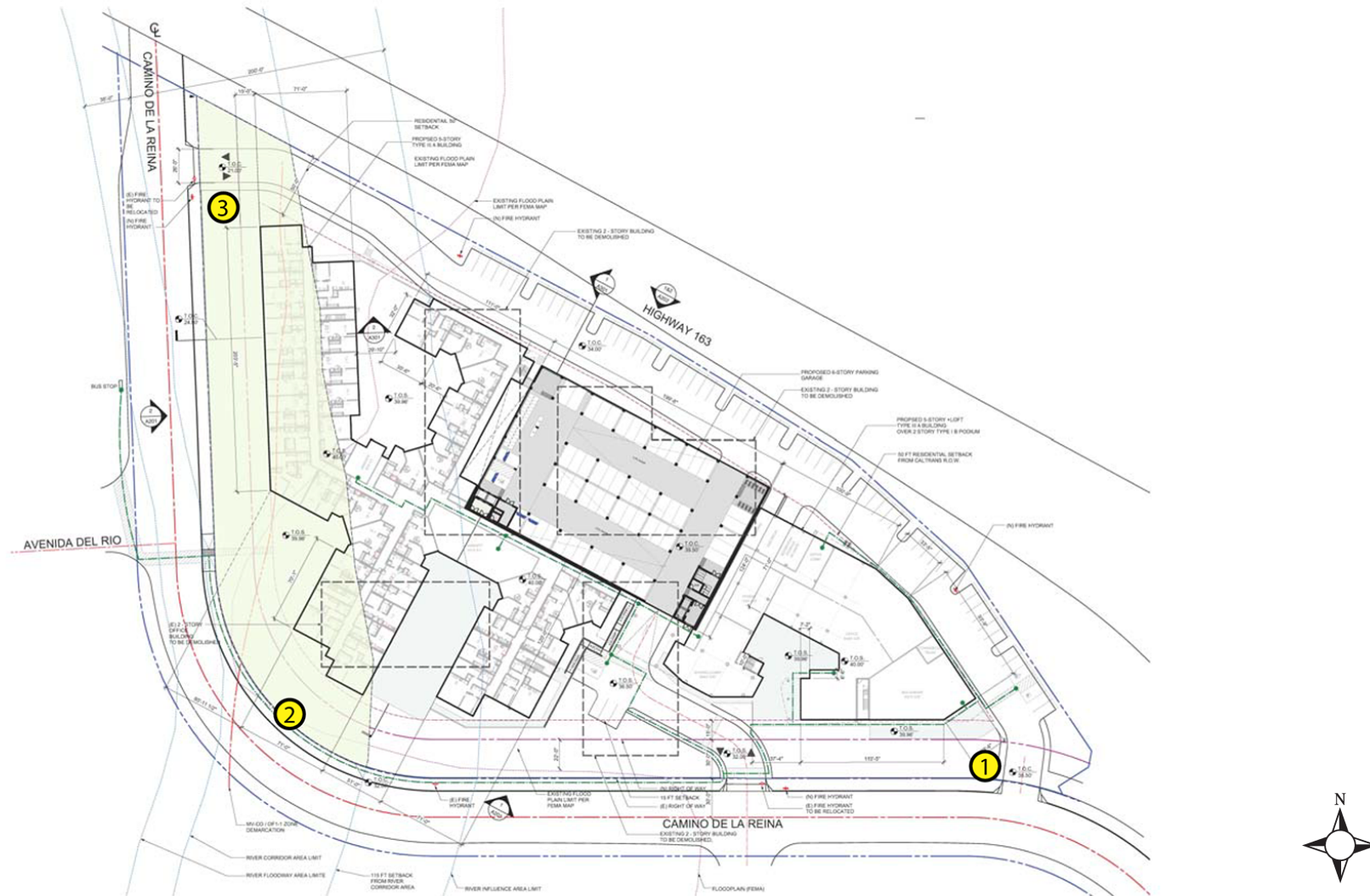


Figure 5.7-1. Noise Monitoring Locations

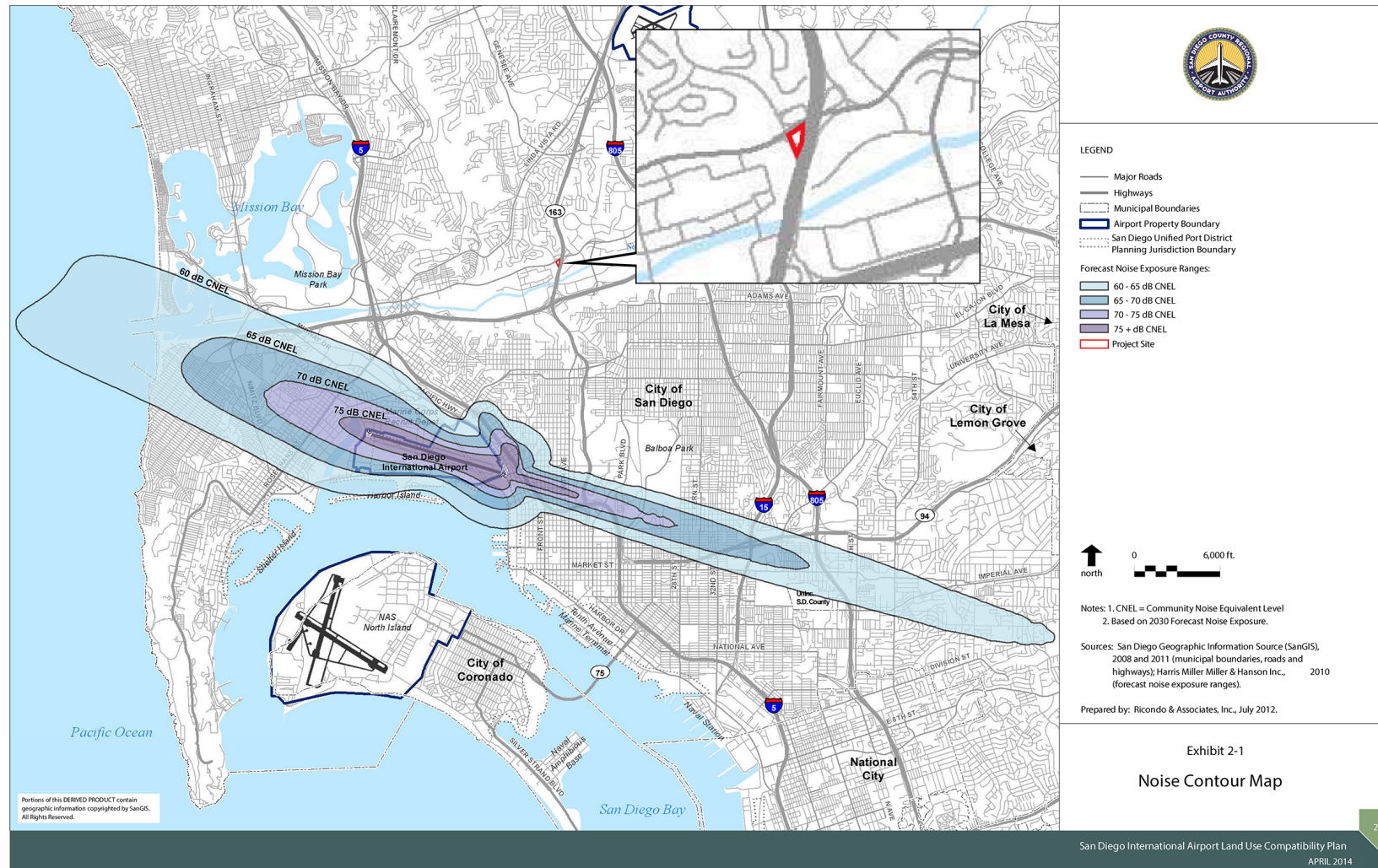


Figure 5.7-2. San Diego International Airport – Noise Contour Map

5.8 Geologic Conditions

Leighton and Associates, Inc. conducted a *Geotechnical Investigation* for the Alexan Fashion Valley project. The results of that investigation are presented in this section. The complete *Geotechnical Investigation* (February 24, 2016) and *Response to City Comments* (June 27, 2016) are included in Appendix G of this EIR.

5.8.1 Existing Conditions

The project site is a roughly triangular shaped parcel of land that is located at 123 Camino de la Reina in Mission Valley community of the City of San Diego, California. The site is located northwest of SR-163 and south and east of Camino de la Reina. The site is approximately 4.92 acres in size. The San Diego River is located approximately 200 feet north of the site across Camino de la Reina, and a commercial property currently consisting of the San Diego Union Tribune building is located west of the site. Site elevations vary between 26 feet and 40 feet above mean sea level (AMSL), with topography across the site gently sloping away from the center of the property toward the north, west, and south.

SOIL AND GEOLOGIC CONDITIONS

The project site is located in the Peninsular Ranges Geomorphic Province of California and is underlain by localized undocumented artificial fill overlying surficial alluvial floodplain deposits (Quaternary-aged Young Alluvial Floodplain Deposits) in turn underlain by Tertiary-age Friars Formation. Although the Friars Formation was not encountered during exploration drilling conducted as part of the *Geotechnical Investigation*, it is believed to occur at a depth of approximately 75 feet.

Undocumented Fill (Afu)

Undocumented fill averages approximately 10 feet in thickness across the site, and thins towards the north, west and south. The fill was apparently placed during the site's initial construction and deeper fills may exist that were not observed during the exploration. The fill soils generally consisted of reddish brown to medium brown, moist, medium dense, clayey to silty sand with scattered gravel and some debris such as brick and glass.

Quaternary Young Alluvial Flood-Plan Deposits (Qya)

Quaternary-aged Young Alluvial Flood-Plain Deposits underlie the site. Young alluvial flood-plain deposits underlay the fill and consist of materials that range from silty sand to sandy silt, and silts to clays. At one location, the alluvium immediately underlying the fill contained abundant organics. The base of the alluvial flood-plain deposits consists of a gravel lag layer at a depth of approximately 70 to 75 feet. The materials are generally unconsolidated, loose to medium dense and soft to firm. The

young alluvium generally consists of interbedded layers of gray-brown to dark-brown, friable, medium dense, clayey and silty sand, and moderately to very stiff, clay and sandy to silty clay and silt.

GROUNDWATER

Groundwater was observed in all of the explorations at the site at a depth of between approximately eight to 21 feet below the ground surface. These depths correspond to approximate elevations between 17 and 20 feet AMSL. Based on the nature of the proposed construction and types of near-surface soils, as well as the observed depth of groundwater, any groundwater conditions encountered during development due to the construction of the new site improvements will be mitigated. Deep foundations are expected to encounter groundwater during development.

FLOOD HAZARD

According to a FEMA Flood Insurance Rate Map (FIRM) (FEMA, 2012); the entire site is located within a Zone X floodplain, and the northeastern portion of the site is located with a Zone AE (100-year) floodplain. The site is also located downstream of a dam(s) (El Capitan and San Vicente Reservoirs) and is within a mapped dam inundation area. Based on the Geotechnical Investigation and associated site reconnaissance, the potential for flooding of the site is considered low, because the adjacent portion of the San Diego River has been channelized. (See Section 5.10, *Hydrology*, for a discussion of flooding.)

REGIONAL TECTONIC SETTING AND SEISMICITY

The site is considered to lie within a seismically active region, as is all of Southern California. During the late Pliocene, several new faults developed in Southern California, creating a new tectonic regime superposed on the flat-lying section of Tertiary and late Cretaceous rocks in the San Diego region. The principal known onshore faults which collectively account for the majority of seismic hazard in southernmost California are the San Andreas, San Jacinto, Elsinore, Imperial and Rose Canyon faults. The balance of seismic hazard is taken by the offshore zone of faults which include the Coronado Bank, San Diego Trough, and San Clemente faults off of the San Diego. Most of the offshore faults coalesce south of the international border, where they come onshore as the Agua Blanca fault which transects the Baja California peninsula south of Ensenada (Jennings, 2010).

The primary seismic hazard for San Diego is the Rose Canyon fault zone which is located approximately 1.8 miles west of the site and is the 'active' seismogenic fault considered having the most significant effect at the site from a design standpoint. There are no known active or potentially active faults transecting, or projecting toward the site.

Seismic Hazards

Severe ground shaking is most likely to occur during an earthquake on one of the regional active faults in Southern California that are mentioned above. Provided in Table 5.8-1, *CBC Mapped Spectral Acceleration Parameters*, are the risk-targeted spectral acceleration parameters for the project determined in accordance with the 2013 California Building Code (CBSC, 2013) and the USGS U.S. Seismic Design Map tool (Version 3.1.0). The effect of seismic shaking is minimized by adhering to the California Building Code and appropriate state-of-the-art seismic design parameters of the Structural Engineers Association of California.

Table 5.8-1. CBC Mapped Spectral Acceleration Parameters

Site Class	D
Site Coefficients	$F_a = 1.030$ $F_v = 1.547$
Mapped MCE_R Spectral Accelerations	$S_S = 1.176g$ $S_1 = 0.453g$
Site Modified MCE_R Spectral Accelerations	$S_{MS} = 1.211g$ $S_{M1} = 0.701g$
Design Spectral Accelerations	$S_{DS} = 0.807g$ $S_{D1} = 0.467g$

Shallow Ground Rupture

As previously discussed, no faults are mapped transecting or projecting toward the site. Therefore, surface rupture hazard due to faulting is considered very low. Ground cracking due to shaking from a seismic event is not considered a significant hazard either, since the site is not located near slopes.

Mapped Seismic Hazard Zones

The site is not located within a State mapped Earthquake Fault Zone (EFZ). However, the site is located within a City mapped geologic Hazard Category Number 31 for Liquefaction (High Potential - shallow groundwater, major drainages, hydraulic fills), which can be associated with secondary seismic hazards, as discussed below.

SECONDARY SEISMIC HAZARDS

In general, secondary seismic hazards can include soil liquefaction, seismically-induced settlement, lateral displacement, surface manifestations of liquefaction, landslides, seiches, and tsunamis. The potential for secondary seismic hazards at the subject site is discussed below.

Liquefaction and Dynamic Settlement

Liquefaction and dynamic settlement of soils can be caused by strong vibratory motion due to earthquakes. Granular soils tend to densify when subjected to shear strains induced by ground shaking during earthquakes. Research and historical data indicate that loose granular soils underlain

by a near surface ground water table are most susceptible to liquefaction, while the most clayey materials are not susceptible to liquefaction. Liquefaction is characterized by a loss of shear strength in the affected soil layer, thereby causing the soil to behave as a viscous liquid. This effect may be manifested at the ground surface by settlement and, possibly, sand boils where insufficient confining overburden is present over liquefied layers. Where sloping ground conditions are present, liquefaction-induced instability can result.

Based on the results of the liquefaction analysis conducted for the project site, several discontinuous and variable thickness liquefiable layers of saturated alluvial materials are located between depths of approximately ten to 75 feet. Saturated layers located above 50 feet are considered susceptible to liquefaction at the design earthquake ground motion. Total dynamic settlement at the site as a result of the Design Earthquake Ground Motion is roughly estimated at between approximately five to 10.5 inches. Differential dynamic settlement at the site is anticipated to be on the order of two inches over 50 feet considering the depth and nature of the liquefied zones.

Lateral Spread

The susceptibility to earthquake-induced lateral spread due to liquefaction is considered to be moderate for the site because of the nature of the underlying liquefiable layers, topography, and proximity to the San Diego River. The nearest distance from the site to an open slope face is approximately 100 feet at the edge of the San Diego River where the face of the river channel is modified to an approximately ten feet high with a 2:1 (horizontal : vertical) slope.

Tsunamis and Seiches

Based on a site elevation of approximately 25 to 40 feet AMSL, the distance of the site from the Pacific coastline, and the CGS Tsunami Inundation Map of the area (CGS, 2009) the potential for flood damage to occur at the site from a tsunami or seiche is considered remote.

Landslides

Several formations within the San Diego region are particularly prone to landslides. These formations generally have high clay content and mobilize when they become saturated with water. Other factors, such as steeply dipping bedding that project out of the face of the slope and/or the presence of fracture planes, will also increase the potential for landslides.

No landslides or indications of deep-seated landslides were indicated at the site during field exploration or review of available geologic literature, topographic maps, and stereoscopic aerial photographs. Furthermore, field reconnaissance conducted for the project and review of local geologic maps indicate that the site is generally underlain by favorable oriented geologic structure,

consisting of massively bedded silty to clayey sands and sandy to silty clays. Therefore, the potential for significant landslides or large-scale slope instability at the site is considered remote.

5.8.2 Impact Analysis

Thresholds of Significance

Based on the City of San Diego's *Significance Determination Guidelines under the California Environmental Quality Act* for impacts to geology, a project may result in a significant impact if it meets one or more of the following criteria:

- If the project would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.
 - Strong seismic ground shaking.
 - Seismic-related ground failure, including liquefaction.
 - Landslides.
- If the project would result in substantial soil erosion or the loss of topsoil.
- If the project is located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
- If the project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.
- If the project would have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (*NOTE: The project would be served by sewer and does not propose the use of septic tanks or alternative wastewater disposal systems. Therefore, this threshold does not apply.*)

Issue 1

Would the proposal expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

Issue 2

Would the proposal 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 an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Issues 1 and 2 address the following thresholds of significance:

- If the project would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.
 - Strong seismic ground shaking.
 - Seismic-related ground failure, including liquefaction.
 - Landslides.
- If the project is located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Impact Analysis

The project proposes to develop a mixed-use project on a site that has been graded and fully developed. The proposed project involves demolition of the existing site improvements and replacement with a multi-building, multi-story mixed-use development. The project would include residential units, commercial office space and restaurant space, surface and structured parking, and a variety of amenities to serve residents, employees, and visitors. Asphalt concrete paved surface driveways and drive aisles would provide access to the project from the north, west, and southwest off Camino De La Reina.

Based on a review of published geologic maps and reports, the site is not located on any known active, potentially active, or inactive fault traces. In the event of a major earthquake on the referenced faults or other significant faults in the Southern California and northern Baja California area, the site could be subjected to moderate to severe ground shaking. With respect to this hazard, the site is considered comparable to others in the general vicinity. Additionally, seismic design of the proposed structures would be performed in accordance with guidelines currently adopted by the City of San Diego.

Landslides are not present at the property or at a location that could impact the site. Therefore, the risk associated with landslide hazard does not exist.

Seiches are periodic oscillations in large bodies of water such as lakes, harbors, bays, or reservoirs. The risk potential for damage to the subject site caused by seiches is relatively low, due to the project's distance from large bodies of water. The risk associated with inundation hazard associated with seiche is low.

According to the *City of San Diego Seismic Safety Study, Geologic Hazards and Faults*, the Alexan Fashion Valley project site is categorized as Category Number 31 for *Liquefaction: High Potential – shallow groundwater, major drainages, hydraulic fills*. The liquefaction analysis performed for the project as part of the *Geotechnical Investigation* indicates that several discontinuous and variable thickness liquefiable layers of saturated alluvial materials are located between depths of approximately ten to 75 feet. The saturated layers located above 50 feet are considered susceptible to liquefaction at the design earthquake ground motion. Total dynamic settlement at the site as a result of the Design Earthquake Ground Motion is roughly estimated at between approximately five to 10.5 inches. Differential dynamic settlement at the site is anticipated to be on the order of two inches over 50 feet considering the depth and nature of the liquefied zones. Additionally, the susceptibility to earthquake-induced lateral spread due to liquefaction is considered to be moderate for the site because of the nature of the underlying liquefiable layers, topography, and proximity to the San Diego River.

The liquefaction analysis performed by Leighton and Associates, Inc. indicates several discontinuous and variable thickness liquefiable layers of saturated alluvial are located between a depth of ten to 75 feet. The saturated layers located above 50 feet are considered susceptible to liquefaction at the design earthquake ground motion. Special measures would be required to mitigate the effects of liquefaction and seismic settlement at the project site.

Impact 5.8-1 Geologic conditions on-site allow for the potential of liquefaction.

According to a FEMA FIRM (FEMA, 2012); the entire site is located within a Zone X floodplain, and the northeastern portion of the site is located with a Zone AE (100-year) floodplain. (See Figure 5.11-2, Project Site's Location in Relation to Special Flood Hazard Zone.) Based on review of topographic maps, the site is also located downstream of a dam(s) (El Capitan and San Vicente Reservoirs) and is within a 10949.001 mapped dam inundation area. As presented in Section 5.11, Hydrology, in accordance with City requirements, the minimum elevation of the finished floor elevation of any building must be two feet above the 100-year frequency flood elevation. The project proposes import of fill material to raise building finished floor elevations to at least two feet above the 100-year floodplain. With the project proposed grading, implementation of the proposed project would not result in significant and unavoidable flooding impacts.

Significance of Impacts

The proposed project would not expose people or property to potentially substantial effects including the risk of life, injury, or death due to hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazard. No significant environmental impacts would occur.

The main geotechnical and geologic conditions that would impact the proposed construction are the presence of undocumented fill soils that are potentially compressible under additional loads and

deep, relatively loose alluvial soils that are subject to liquefaction during a major seismic event. Impacts relative to liquefaction are potentially significant and require mitigation measures.

Mitigation Measures

Impacts relative to liquefaction are considered potentially significant. The following mitigation measure would be required.

MM 5.8-1 Stone columns shall be used to mitigate the effects of liquefaction. A site-specific ground improvement plan shall be developed to contain the location of stone columns design diameter and spacing. The ground improvement program should be designed by the specialty ground improvement contractor performing the work with the goal of mitigating liquefaction and reducing anticipated settlements to a level that is acceptable to the project structural engineer.

Significance of Impacts following Implementation of Mitigation Measures

Implementation of mitigation measure MM 5.8-1 would reduce project impacts to below a level of significance.

Issue 3

Would the proposal result in a substantial increase in wind or water erosion of soils, either on or off the site?

Issue 3 addresses the following threshold of significance:

- If the project would result in substantial soil erosion or the loss of topsoil.

Impact Analysis

The project proposes development of the project site with structures, hardscape, driveways, parking garage, surface parking, and extensive landscaping. As presented in Section 5.11, *Hydrology*, and Section 5.12, *Water Quality*, drainage for the site would be adequately controlled such that substantial runoff would not occur, and storm drains have been sized to handle storm water runoff. The project site is currently fully developed with buildings, parking areas, and landscaping. Wind erosion does not occur. Proposed development of the project would result in constructing new buildings, a parking structure, and parking areas, and installing landscaping. The project would not result in a substantial increase in wind or water erosion. No significant impacts would occur.

Significance of Impacts

The proposed project would not result in a substantial increase in wind or water erosion of soils, either on or off the site. No significant environmental impacts would occur.

Mitigation Measures

No significant impacts would occur. Therefore, no mitigation measures are required.

Significance of Impacts following Implementation of Mitigation Measures

There are no impacts relative to wind or water erosion of soils. No mitigation is required.

5.9 Paleontological Resources

The analysis presented in this section evaluates the potential for impacts to paleontological resources based on existing geologic formations that underlay the project site. Refer to Section 5.8, *Geologic Conditions*, for a discussion of the geologic formations that could be affected by the project.

5.9.1 Existing Conditions

Paleontological resources, or fossils, are the remains and/or traces of prehistoric plant and animal life. Fossils provide direct evidence of ancient organisms and document the patterns of organic evolution and extinction that have characterized the history of life. Fossil remains, such as bones, teeth, shells, and wood, are found in the geologic deposits (sedimentary rock formations) within which they were originally buried in deep bedrock layers of sandstone, mudstone, or shale. Paleontological resources contain not only the actual fossil remains, but also the localities where those fossils are collected and the geologic formations containing the localities.

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. For this reason, knowledge of the geology of a particular area and the paleontological resource sensitivity of particular rock formations make it possible to predict where fossils will or will not be encountered.

Paleontological resource sensitivity is typically rated from high to zero depending upon the impacted formations. The sensitivity of the paleontological resource determines the significance of a paleontological impact. The specific criteria applied for each sensitivity category are summarized below.

- **High Sensitivity** - High sensitivity is assigned to geologic formations known to contain paleontological localities with rare, well-preserved, critical fossil materials for stratigraphic or paleoenvironmental interpretation, and fossils providing important information about the paleobiology and evolutionary history (phylogeny) of animal and plant groups. Generally speaking, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.
- **Moderate Sensitivity** - Moderate sensitivity is assigned to geologic formations known to contain paleontological localities with poorly preserved, common elsewhere, or stratigraphically unimportant fossil material. The moderate sensitivity category is also applied to geologic formations that are judged to have a strong, but unproven potential for producing important fossil remains (Bay Point Formation).

- **Low Sensitivity** - Low sensitivity is assigned to geologic formations that, based on their relatively youthful age and/or high-energy depositional history, are judged unlikely to produce important fossil remains. Typically, low sensitivity formations produce poorly preserved invertebrate fossil remains in low abundance (Quaternary Alluvium).
- **Zero Sensitivity** - Zero sensitivity is assigned to geologic formations that are entirely igneous in origin and therefore have no potential for producing fossil remains. Artificial fill materials are also placed in this category.

As described in Section 5.8, *Geologic Conditions*, of this EIR, the project area is underlain by undocumented artificial fill, Quaternary-aged Young Alluvial Floodplain Deposits, and Tertiary-age Friars formation. The Friars formation was not encountered during exploration drilling it was believed to have been encountered in Core Penetration Test (CPT) -1 at a depth of 75 feet. The sensitivity for each of these geologic formations that may contain important paleontological resources is described below.

UNDOCUMENTED FILL (AFU)

During the subsurface exploration undocumented artificial fill soil was encountered at approximately 10 to 11 feet below the existing site grades. The fill soils generally consisted of reddish brown to medium brown, moist, medium dense, clayey to silty sand with scattered gravel and some debris such as brick and class.

QUATERNARY YOUNG ALLUVIAL FLOOD-PLAIN DEPOSITS(QYA)

Underlying the fill materials on-site, Quaternary-age young alluvial flood-plain deposits were encountered. The base of the alluvial flood-plain deposits consists of a gravel lag layer at a depth of 70-75 feet below existing site grades. As encountered, the materials are generally unconsolidated, loose to medium dense and soft to firm. The young alluvium generally consists of interbedded layers of gray-brown to dark-brown, friable, medium dense, clayey and silty sand, and moderately to very stiff clay and sandy to silty clay and silt. Alluvium has a low sensitivity for paleontological resources.

FRIARS FORMATION

The Friars Formation consists mainly of sandstones, siltstone, mudstones, and cobble conglomerate. It is rich in vertebrate fossils, especially terrestrial mammals such as primates, rodents, artiodactyls, and perissodactyls. Well-preserved remains of marine microfossils and macroinvertebrates, and remains of fossil leaves have been recovered from the Friars Formation. The formation crops out from Mission Valley north to Rancho Bernardo in the east and Rancho Santa Fe in the west. In the south, the formation extends from Tecolote Canyon east to Santee and Lakeside. This formation is given high paleontological resource sensitivity.

5.9.2 Impact Analysis

Thresholds of Significance

The City of San Diego's *California Environmental Quality Act Significance Thresholds* provides guidance to determine potential significance to paleontological resources. Based on the City's *California Environmental Quality Act Significance Thresholds*, a project could result in significant impacts to paleontological resources if it requires:

1. Over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit.
2. Over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.

The City of San Diego has compiled the *Paleontological Determination Matrix* (Table 5.9-1, below) to support the City's Significance Thresholds. Additionally, the Significance Thresholds provide the following two guidelines to assist in determining significance:

1. If there are sedimentary rocks such as those found in the coastal areas, they usually contain fossils.
2. If there are granitic or volcanic rocks such as those found in the inland areas, they usually will not contain fossils.

Issue 1

Would the proposal require over 1,000 cubic yards of excavation at a depth of ten feet or more in a high resource potential geologic deposit/formation/rock unit?

Issue 2

Would the proposal require over 2,000 cubic yards of excavation at a depth of ten feet or more in a moderate resource potential geologic deposit/formation/rock unit?

Issues 1 and 2 address the following thresholds of significance:

- Over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit.
- Over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.

Impact Analysis

As stated above, the project site is underlain by undocumented fill; alluvial floodplain deposits; and at substantial depths (75 feet) below the surface, Friars Formation. Undocumented (artificial) fill is

assigned a zero sensitivity to contain important paleontological resources and alluvium have a low sensitivity for paleontological resources. Grading within these formations would not result in significant impacts to paleontological resources.

The Friars formation has a high resource potential within the Mission Valley community, as well as all other communities in the City of San Diego. Grading within Friars formation could encounter paleontological resources.

The proposed project would result in approximately 2,100 cubic yards of cut and 14,700 cubic feet of fill. The maximum depth of cut would be six feet, and the maximum fill depth would be 12.5 feet. According to the City of San Diego's *California Environmental Quality Act Significance Thresholds*, implementation of a proposed project would have the potential to significantly impact paleontological resources, as grading of geologic formations that occurs in a high resource potential geologic deposit/formation/rock unit – such as the Friars formation that underlies most of the project site – does exceed 1,000 cubic yards. However, as determined by the *Geotechnical Investigation* (see Appendix G), Friars formation occurs at substantial depths 75 feet below existing grades. Because the project would not require grading or construction (including any pilings) that would reach 75 feet in depth, the Friars formation would not be encountered; and impacts associated with potential paleontological resources that could occur in the Formation would be avoided. No impacts to high resource potential geologic formations would occur.

Significance of Impacts

The Alexan Fashion Valley project does not have the potential to impact paleontological resources; excavation quantities would not exceed the City's thresholds. The maximum depth of cut for the project would be six feet, and would not occur within geologic formations known to exhibit paleontological resources. No mitigation would be required.

Mitigation Measures

The proposed project would only reach a depth of six feet and would not result in impacts to moderate or high sensitivity geologic formations. Therefore, no mitigation is required.

Significance of Impacts Following Implementation of Mitigation Measures

No mitigation is required.

Table 5.9-1. Paleontological Determination Matrix

Geological Deposit/Formation/ Rock Unit	Potential Fossil Localities	Sensitivity Rating
Alluvium (Qsw, Qal, or Qls)	All communities where unit occurs	Low
Ardath Shale (Ta)	All communities where unit occurs	High
Bay Point/Marine Terrace (Qbp) ¹	All communities where unit occurs	High
Cabrillo Formation (Kcs)	All communities where unit occurs	Moderate
Delmar Formation (Td)	All communities where unit occurs	High
Friars Formation (Tf)	All communities where unit occurs	High
Granite/Plutonic (Kg)	All communities where unit occurs	Zero
Lindavista Formation (Qln, Qlb) ²	Mira Mesa/Tierrasanta	High
	All other areas	Moderate
Lusardi Formation (Kl)	Black Mountain Ranch/Lusardi Canyon Poway/Rancho Santa Fe	High
	All other areas	Moderate
Mission Valley Formation (Tmv)	All communities where unit occurs	High
Mt. Soledad Formation (Tmv)	Rose Canyon	High
	All other areas where unit occurs	Moderate
Otay Formation (To)	All communities where unit occurs	High
Point Loma Formation (Kp)	All communities where unit occurs	High
Pomerado Conglomerate (Tp)	Scripps Ranch/Tierrasanta	High
	All other areas	
River/Steam Terrace Deposits (Qt)	South Eastern/Chollas Valleys/ Fairbanks Ranch/Skyline/Paradise Hills/Otay Mesa, Nestor/San Ysidro	Moderate
	All other areas	Low
San Diego Formation (Qsd)	All communities where unit occurs	High
Santiago Peak Volcanics (Jsp) Metasedimentary	Black Mountain Ranch/La Jolla Valley, Fairbanks Ranch/Mira Mesa/ Peñasquitos	Moderate
Santiago Peak Volcanics (Jsp) Metavolcanic	All other areas	Zero
Scripps Formation (Tsd)	All communities where unit occurs	High
Stadium Conglomerate (Tst)	All communities where unit occurs	High
Sweetwater Formation	All communities where unit occurs	High
Torrey Sandstone (Tf)	Black Mountain Ranch/Carmel Valley	High
	All other areas	Low

Sensitivity Rating Grading Thresholds for Required Monitoring

High = >1,000 cubic yards and 10 feet+ deep

Moderate = >2,000 cubic yards and 10 feet+ deep

Zero-Low = Monitoring not required

Baypoint¹ – Broadly correlative with Qop 1-8 of Kennedy and Tan (2008) new mapping nomenclature.

Lindavista² – Broadly correlative with Qvop 1-13 of Kennedy and Tan (2008) new mapping nomenclature.

Notes: *Monitoring is always required when grading on a fossil recovery site or near a fossil recovery site in the same geologic deposit/formation/rock unit as the project site as indicated on the Kennedy Maps.

 **Monitoring may be required for shallow grading (i.e., <10ft) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface.

 ***Monitoring is not required when grading documented or undocumented artificial fill.

5.10 Historical Resources

This section of the EIR is based on the *Archeological Resource Report Form* prepared for the proposed project by ASM Affiliates, dated March 12, 2015. A copy of the *Archeological Resource Report Form* is included as Appendix L to this EIR.

5.10.1 Existing Conditions

The project site is fully developed. Existing development consists of the commercial building at 123 Camino de la Reina, two associated parking lots, landscaping and hardscaping. The proposed project site does not contain any known cultural resources. However, other developments within the vicinity have discovered historic resources of archaeological significance, most likely due location near a historical fresh water source, the San Diego River.

BUILT ENVIRONMENT

The founder of modern San Diego was Alonzo Erastus Horton, who arrived in San Diego in 1867. During the 1870s, the telephone, telegraph, and electricity arrived in San Diego and the water supply was improved. Throughout the 1880s, San Diego experienced a massive real estate boom. The city expanded physically as a result of the improvements to the regional highway network in the 1950s.

The first major urban development in Mission Valley was the Mission Valley Shopping Center (now Westfield Mission Valley). Hotel Circle became an important commercial-recreation and visitor-oriented area. The development of the Mission Valley Shopping Center was soon followed with Jack Murphy Stadium (now Qualcomm Stadium), which was completed in 1967. Over time, the Mission Valley area has developed with mixed-use and multiple dwelling unit neighborhoods, office complexes, small and large retail centers, and light industrial parks.

The project site is fully developed with buildings, parking lots, and associated improvements. The existing development on the project site was constructed in 1973.

ARCHAEOLOGY

The prehistory of San Diego County has most frequently been divided chronologically into three or four major periods. An Early Man stage, perhaps dating back tens of thousands of years, has been proposed, but no widely accepted evidence of human occupation of North America dating prior to about 12,000 B.C. has emerged. More generally accepted divisions include a Terminal Pleistocene/Early Holocene period (ca. 12,000-6000 B.C.), a Middle/Late Holocene period (ca. 6000 B.C.-A.D. 800), and a Late Prehistoric period (ca. A.D. 800-1769). For the Terminal Pleistocene/Early Holocene period (ca. 12,000-6000 B.C.), the earliest chronologically distinctive archaeological evidence is the Clovis pattern. Dated elsewhere in North America to around 11,500 B.C., Clovis assemblages are distinguished primarily by large fluted projectile points. At least three isolated fluted points have been reported within San Diego County. The most widely recognized

archaeological pattern within this period is termed San Dieguito and has been dated from at least as early as 8500 B.C. to perhaps around 6000 B.C. Archaeological evidence from the Middle/Late Holocene Period (ca. 6000 B.C.-A.D. 800) period in the coastal San Diego region has been characterized as belonging to the Archaic stage, Millingstone horizon, Encinitas tradition, or La Jolla pattern. Distinctive characteristics of the La Jolla pattern include extensive shell middens, portable ground stone metates and manos, crudely flaked cobble tools, occasional large expanding stemmed projectile points (Pinto and Elko forms), and flexed human burials. A Late Prehistoric period (ca. A.D. 800-1769) in coastal San Diego County has been distinguished, primarily on the basis of three major innovations: the use of small projectile points, brownware pottery, and the practice of human cremation. Labels applied to the archaeological manifestations of this period include Yuman, Cuyamaca, Patayan, and Hakataya. Traits characterizing the Late Prehistoric period include a shift toward greater use of inland rather than coastal settlement locations, greater reliance on acorns as an abundant but labor-expensive food resource, a greater emphasis on hunting of both large and small game, a greater amount of interregional exchange, more elaboration of nonutilitarian culture, and possibly denser regional populations.

In ethnohistoric times, central and southern San Diego County was occupied by speakers of a Yuman language or languages, variously referred to as Kumeyaay, Diegueño, Tipai, and Ipai. Kumeyaay territory extended from south of Agua Hedionda Lagoon, Escondido, and Lake Henshaw to south of Ensenada in northern Baja California, and east nearly as far as the lower Colorado River. The Kumeyaay inhabited a diverse environment that included littoral, valley, foothill, mountain, and desert resource zones. A large number of village sites have been identified throughout San Diego County. The diet of the Kumeyaay included both plant and animal foods, and groups residing near Mission Valley could have utilized several ecological niches varying by altitude.

The San Diego River was a major source of fresh water in the San Diego Metropolitan Area, which has attracted people to the valley since prehistoric times. The valley has also been used for its sand and gravel extraction in the early 1950s and has played a key role in local and regional transportation since prehistoric times.

REGULATORY SETTING

As described in the City's CEQA *Significance Determination Thresholds*, Federal, State, and local criteria have been established for the determination of historical resource significance. The criteria for determining a resource's significance generally focus on a resource's integrity and uniqueness, its relationship to similar resources, and its potential to contribute important information to scholarly research. Some resources that do not meet Federal significance criteria may be considered significant under State or local criteria.

Federal

National Historic Preservation Act of 1966 and National Register of Historic Places. The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as the official Federal list of cultural resources that have been nominated by State offices for their significance at the local, State, or Federal level. Listing on the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) on the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing on the NRHP.

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

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

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the State CEQA Guidelines (Section 15064.5), as well.

State

California Environmental Quality Act. For the purposes of CEQA, a significant historic resource is one that qualifies for the California Register of Historic Resources (CRHR) or is listed in a local historic register or deemed significant in an historical resources survey, as provided under Section 5024.1(g) of the Public Resources Code. A resource that is not listed in or is not determined to be eligible for listing in the CRHR, is not included in a local register or historic resources, or is not deemed significant in an historical resources survey may nonetheless be deemed significant by a CEQA lead agency.

As indicated above, the California criteria (State CEQA Guidelines Section 15064.5) for the registration of significant architectural, archaeological, and historical resources on the CRHR are nearly identical to those for the NRHP. Furthermore, CEQA Section 21083.2(g) defines the criteria for determining the significance of archaeological resources. These criteria include definitions for a “unique” resource, based on its:

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

Public Resources Code Section 5020 et seq. Properties listed, or formally designated eligible for listing, on the NRHP are automatically listed on the CRHR, as are State Historical Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

Public Resources Code Section 5097 et seq. State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and designates the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to a year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

Local

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

- Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
- Is identified with persons or events significant in local, State, or national history;

- Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;
- Is listed or has been determined eligible by National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office (SHPO) for listing on the State Register of Historical Resources; or
- Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City."

City of San Diego Municipal Code: Historical Resources Regulations and Historical Resources

Guidelines. The City's Historical Resources Regulations (SDMC 143.0201 *et seq.*), determine the procedures for processing proposed development plans, among other things, if designated historical resources are present on a site. If a substantial alteration to a site's historic resource is proposed, mitigation must be provided in accordance with the Historical Resources Guidelines.

The City's Historical Resources Guidelines serve to implement the Historical Resources Regulations in compliance with applicable local, State, and Federal policies and mandates. When avoidance of a significant resource is not possible, the City's Guidelines require preparation and implementation of a research design and data recovery program. The guidelines are intended to maintain consistency in the identification, evaluation, preservation/mitigation, and development (i.e., management) of the City's historical resources.

5.10.2 Impact Analysis**Thresholds of Significance**

Federal, state, and local criteria have been established for the determination of historical resource significance. These criteria are used by the City of San Diego to determine significance under CEQA, as provided below.

NATIONAL REGISTER OF HISTORIC PLACES

The National Register criteria, contained in National Register Bulletin 16 (U.S. Department of the Interior 1986:1), state that:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

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

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

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT

For the purposes of CEQA, a significant historic resource is one which qualifies for the California Register of Historical Resources or is listed in a local historic register or deemed significant in a

historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code. A resource that is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historic resources, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA. The City's determination of significance of impacts on historical and unique archaeological resources is based on the criteria found in Section 15064.5 of the State CEQA Guidelines.

CITY OF SAN DIEGO GENERAL PLAN

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

CITY OF SAN DIEGO HISTORICAL RESOURCES REGISTER

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

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

CITY OF SAN DIEGO CEQA SIGNIFICANCE

As stated above, if a resource is not listed in, or determined eligible for listing in, the California Register, is not included in a local register, or is not deemed significant in a historical resource

survey, it may nonetheless be historically significant. The significance of a historical resource is based on the potential for the resource to meet one or more of the criteria presented above, including the potential to address important research questions as documented in a site-specific technical report prepared as part of the environmental review process. Research priorities for the prehistoric, ethnohistoric, and historic periods of San Diego history are discussed in Appendix A (San Diego History) to the City's *Historical Resources Guidelines* and should be used in the determination of historical significance. As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA.

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

NON-SIGNIFICANT RESOURCE TYPES

Isolates consist of less than three artifacts/ecofacts within a 40-square-meter area. Sparse Lithic Scatters are identified and evaluated based on criteria from the OHP's California Archaeological Resource Identification and Data Acquisition Program; Sparse Lithic Scatters (February 1988). Isolated Bedrock Milling Stations are defined as having no associated site within a 40-meter radius and lacking a subsurface component. Shellfish Processing Sites are defined as containing a minimal amount of lithics (i.e. less than five or six) and no subsurface deposit. Historic buildings, structures, objects, and landscapes are generally not significant if they are less than 45 years old. A non-significant building or structure located within a historic district is by definition not significant. Resources found to be non-significant as the result of a survey and assessment will require no further work beyond documentation of the resources (including site records) and inclusion in the survey and assessment report.

Issue 1

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

Issue 1 addresses the following thresholds of significance:

- A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event.
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived.
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance.
- A property achieving significance within the past 50 years, if it is of exceptional importance.
- Exemplifies or reflects special elements of the City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development.
- Is identified with persons or events significant in local, State, or national history.
- Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship.
- Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman.
- Is listed on or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the California Office of Historic Preservation (OHP) for listing on the State Register of Historical Resources.
- Is a finite group of resources related to one another in a clearly distinguishable way; or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value; or which represent one or more architectural periods or styles in the history and development of the City.

Impact Analysis**BUILT ENVIRONMENT**

The City of San Diego criteria for determination of historic significance, pursuant to the CEQA, is evaluated based upon age (over 45 years), location, context, association with an important event, uniqueness, or structural integrity of the building. In addition, projects requiring the demolition of

structures that are 45 years or older are also reviewed for historic significance in compliance with CEQA. CEQA Section 21084.1 states “A project that may cause a substantial adverse change in the significance of a historical resource is a project that may cause a significant effect on the environment.”

Structures on the property were constructed in 1973 and are, therefore, less than 45 years old. In accordance with San Diego Municipal Code Section 143.0212, a Potential Historic Resources Review of the property was not required. The property does not meet local criteria as an individually significant resource under the adopted Historic Resources Board Criteria. Therefore, no potentially significant structures are present on the property.

ARCHAEOLOGY

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. CEQA requires that before approving discretionary projects the Lead Agency must identify and examine the significant adverse environmental effects that may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (Sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (Sections 15064.5(b)(1). Any historical resource listed in or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

Many areas of San Diego County, including mesas and the coast, are known for intense and diverse prehistoric occupation and important archaeological and historical resources. The region has been inhabited by various cultural groups spanning 10,000 years or more.

An *Archeological Resource Report Form* was prepared for the proposed project by ASM Affiliates (March 12, 2015). Methods used to assess the presence or absence of cultural resources within the project site included search of existing records and an intensive field survey. A record search was conducted at the South Coastal Information Center (SCIC). The search included the Project site and a radius of one-quarter mile around it. A records search of the Sacred Lands File held by the NAHC and historical aerial photographs and historic USGS topographic maps of the project site were consulted.

Twenty-eight reports have addressed cultural resource studies within a one-quarter mile radius of the project site. Six of the reports have addressed a portion of the project site. The entire project site

has been previously surveyed for cultural resources. The records search indicated that no previously recorded cultural resources are located within the project site. Five cultural resources have been previously recorded within the one-quarter mile search radius and consist of historic trash scatters, historic isolates, and the SR-163 bridge. No historic addresses have been previously recorded within the project site. Two historic addresses, I-8 Mission Valley Freeway Bridge (Caltrans Bridge 57-0239F) and the SR-163 Cabrillo Freeway Bridge (Caltrans Bridge 57-0126) are on file at the SCIC within the 1/4-mile records search radius. The record search of the Sacred Land File failed to indicate the presence of Native American cultural resources in the immediate Project site.

No cultural resources were identified within the project site in the records search or during the pedestrian field survey. Although the project site does not contain any recorded archaeological resources as previously mentioned, there are previously recorded sites within close proximity of the project site. Because the project site is located within the alluvial floodplain of the San Diego River, there is the potential for buried subsurface cultural resource deposits. Based on this information, there is a potential for buried cultural resources to be impacted through implementation of the project. Archaeological monitoring is recommended in areas of the project site not impacted by the construction of the existing building at 123 Camino de la Reina, such as the landscaped areas and parking lots surrounding the building. Therefore, there is the potential for ground-disturbing activities to result in impacts to unknown historical resources (archaeology), which would be regarded as a potentially significant impact.

Impact 5.10-1: The proposed project could result in direct impacts to unknown subsurface archaeological resources, as a result of excavation and trenching for the project.

Significance of Impacts

BUILT ENVIRONMENT

The project would involve the demolition of the existing structures on the site. Structures on the property were constructed in 1973 and therefore do not meet the age threshold for eligibility under the City's regulations for listing on the California Register of Historic Resources or the Local Register. No potentially significant historic structures are present on the property.

ARCHAEOLOGY

Although no historical resources were identified within the boundaries of the project site, recorded sites have been identified within proximity to the project site. A review of the historic maps and historic aerial photographs show that the project site was within the San Diego River bed prior to the river being channelized and subsequently within the San Diego River floodplain. Because the project site is located within the alluvial floodplain of the San Diego River, there is the potential for buried

subsurface cultural resource deposits. In addition, given the alluvial setting, there is a potential for buried cultural resources that may not be visible on the surface. Therefore, due to the sensitivity of the area, potentially significant impact to unknown subsurface archeological resources could result during ground-disturbing activities.

Mitigation Measures

Direct impacts to archeological resources could occur as a result of the Alexan Fashion Valley project development. The following mitigation measure is required.

MM 5.10-1 Implementation of the following mitigation measures would reduce any potential impacts to historical resources (archaeology):

I. Prior to Permit Issuance

A. Entitlements Plan Check

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

B. Letters of Qualification have been submitted to ADD

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

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search (1/4-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or,

if the search was in-house, a letter of verification from the PI stating that the search was completed.

2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
 - b. The AME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

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

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

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

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

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.

2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.
- C. If Human Remains **ARE** determined to be Native American
1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
 4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN,
 - c. In order to protect these sites, the Landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement on the site;
 - (3) Record a document with the County.
 - d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and

items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are **NOT** Native American

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

V. Night and/or Weekend Work

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

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed:
 - a. No Discoveries
In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8AM of the next business day.
 - b. Discoveries
All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV - Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
 - c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.
 - d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

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

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

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

B. Handling of Artifacts

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

- C. Curation of artifacts: Accession Agreement and Acceptance Verification
 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.
- D. Final Monitoring Report(s)
 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
 2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

Implementation of this monitoring program will ensure that development of the Alexan Fashion Valley project would mitigate direct project impacts to cultural resources to below a level of significance.

Significance of Impacts following Implementation of Mitigation Measures

Implementation of MM 5.10-1 would mitigate direct impacts to historical resources below a level of significance.

Issue 2

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

Issue 2 addresses the following thresholds of significance:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance

- A site associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population.

Impact Analysis

The project site is fully developed and houses the commercial building at 123 Camino de la Reina. The proposed project would not impact any existing religious or sacred uses.

Significance of Impacts

No existing religious or sacred uses are located on the project site or within the immediate project vicinity. As a result, the Alexan Fashion Valley project would not result in any impacts to religious or sacred uses.

Mitigation Measures

No mitigation measures are recommended.

Significance of Impacts following Implementation of Mitigation Measures

No mitigation measures are recommended.

Issue 3

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

Issue 3 addresses the following thresholds of significance:

- Discovery of human remains shall always be treated as a significant discovery.

Impact Analysis

The project site is fully developed and has been extensively graded during the construction of the existing building. Historic resources were not identified within or adjacent to the project site. Although the project site is fully developed, new development would involve additional excavation and grading. As such, there is a potential for the project to adversely affect unknown, subsurface human remains. This would be regarded as a potentially significant impact.

Impact 5.10-2: The proposed project could result in direct impacts to subsurface archaeological resources – specifically, human remains – as a result of project excavation and trenching.

Significance of Impacts

No cultural resources have been identified on the project site. Additionally, the project site has been graded and developed, leaving the Alexan Fashion Valley project site in a completely altered state.

However, project development would involve grading that may have the potential to unearth previous unknown subsurface archaeological resources in this sensitive area, including human remains. This would be regarded as a potentially significant direct impact.

Potentially significant direct impacts to archaeological resources from grading and construction would be mitigated to below a level of significance through implementing mitigation measure MM 5.10-1.

Mitigation Measures

Direct impacts to subsurface archeological resources – human remains, in particular – could occur as a result of the Camino Del Rio Mixed Use project development. Implementation of mitigation measure MM 5.10-1 is required to mitigate this impact to below a level of significance.

Significance of Impacts following Implementation of Mitigation Measures

Implementation of MM 5.10-1 would mitigate potential impacts associated with encountering human remains to below a level of significance.