# 5.11 Hydrology

Nasland Engineering prepared a *Preliminary Hydrology Study* for the Alexan Fashion Valley project. The results of the hydrology study are presented in this section; the complete *Preliminary Hydrology Study*, dated July 5, 2016, is included in Appendix H of this EIR.

Additionally, a Condition Letter of Map Revision (CLOMR-F) has been submitted to the FEMA to demonstrate that the proposed project would not be inundated by the base flood.

# 5.11.1 Existing Conditions

### SURFACE WATER

The proposed project site is located within the lower San Diego subunit of the San Diego Hydraulic Unit, Lower San Diego Hydrologic Area Mission San Diego Hydrologic Subarea, Basin Number 907.11, as identified in the Water Quality Control Plan for the San Diego Basin (Basin Plan). The main receiving water body in this Hydrologic Subarea is the San Diego River.

The San Diego Hydraulic Unit drains an approximately 440 square-mile area and discharges the combined drainages of the Alvarado Canyon, San Vicente Creek and Foster Creek through the San Diego River into the Pacific Ocean. The drainage area extends easterly to Lake Cuyamaca and westerly to Mission Bay. Average annual precipitation ranges from approximately 9.9 inches along the coast and in excess of 40 inches in the inland mountains.

The San Diego River is located just north of the project site, across Camino de la Reina which forms the project site's northern border. According to the most recent Flood Insurance Rate Maps, the northeastern portion of the Alexan Fashion Valley project site is located inside the 100-year floodplain of the San Diego River.

### DRAINAGE

The existing site encompasses approximately 4.92 acres and consists of four buildings and two open parking lots. The existing conditions are considered to be four separate drainage basins. Storm water from Basin 1 flows through the landscaped area on the east side of the property. As shown in Figure 5.11-1, *Existing On-Site Basins*, sheet flows south towards a curb inlet, and ultimately outlets to an existing 60-inch storm drain main on Camino de la Reina. Basin 2 flows west through a pipe centered between the four existing buildings and outlets into landscaped areas, ultimately discharging onto Camino de la Reina. Basin 3 flows west into landscaping and discharges to existing curb inlet on Camino de la Reina. Basin 4 sheet flows northeast and outlets onto Camino de la Reina and ultimately enters a curb inlet.

### GROUNDWATER

As discussed in Section 5.8, *Geologic Conditions*, groundwater was encountered within exploratory borings at approximate depths ranging from 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 problems to development due to the construction of the new site improvements are not expected, provided sound engineering and construction practices are followed.

### FLOODING

The project site is within the mapped floodplain of a SFHA (San Diego panel 1618F) as identified by the FEMA. According to the FIRM, the entire project site lies within Zone X, which includes areas inundated by 500-year flooding, 100-year flooding with average depths of less than one foot or with drainage areas less than one square mile, and areas protected by levees from inundation by 100-year flooding. A small portion in the northeastern corner of the project site lies within SFHA Zone AE, which is an area inundated by 100-year flooding with Base Flood Elevations (BFE) determined. Figure 5.11-2, *Project Site's Location in Relation to Special Flood Hazard Zone*, shows the project's relationship to the SFHA.

### 5.11.2 Impact Analysis

### Threshold of Significance

Based on the City of San Diego Development Services Department's "Significance Determination Guidelines under the California Environmental Quality Act" for impacts to hydrology, a project may result in a significant impact if it meets one or more of the following criteria:

- If a project would result in increased flooding on- or off-site, there may be significant impacts on upstream or downstream properties and to environmental resources.
- If a project would result in decreased aquifer recharge, there may be significant impacts on hydrologic conditions and well-water supplies because the area available for aquifer recharge is reduced.
- If a project would grade, clear, or grub more than 1.0 acre of land, especially into slopes over a 25 percent grade, and would drain into a sensitive water body or stream, there may be significant impacts on stream hydrology if uncontrolled runoff results in erosion and subsequent sedimentation of downstream water bodies.
- If a project would result in modifications to existing drainage patterns, there may be significant impacts on environmental resources such as biological communities, archaeological resources, etc.

### <u>Issue 1</u>

Would the proposal result in an increase in impervious surfaces and associated increased runoff?

Issue 1 addresses the following thresholds of significance:

- If a project would grade, clear, or grub more than 1.0 acre of land, especially into slopes over a 25 percent grade, and would drain into a sensitive water body or stream, there may be significant impacts on stream hydrology if uncontrolled runoff results in erosion and subsequent sedimentation of downstream water bodies.
- If a project would result in modifications to existing drainage patterns, there may be significant impacts on environmental resources such as biological communities, archaeological resources, etc.

### Impact Analysis

The project site is currently fully developed with 66 percent of the site covered with impervious surfaces (surface parking and buildings). The proposed project would introduce new areas of impervious surfaces that would account for 81 percent of the site. Therefore, the proposed project would result in an increase in impervious surfaces.

Under proposed conditions, the project site would be divided into 17 drainage basins, as shown in Figure 5.11-3, Proposed Basin Exhibit. Basins 1 through 6 would be comprised of impervious runoff from the building roof. Basins 1, 3, 4, and 5 would route via downspouts directly to proposed biofiltration planters. Basins 2 and 6 would discharge from the roof downspouts, which would connect to curb outlets and ultimately drain to a biofiltration planter via concrete swales. All of these planters would discharge to existing storm drains on Camino de la Reina when overflow capacity is met. Basin 7 is the northeast driveway; on-site drainage from this location consists of impervious flow from the asphalt, which would flow towards a curb inlet and bioinfiltration basin within a landscape area. Overflow would outlet to a proposed offsite 24-inch reinforced concrete pipe (RCP) storm drain that connects to an existing curb inlet along Camino de la Reina. Basin 8 consists of the entire drive aisle and parking stalls along the eastern property. Storm water would flow away from the buildings in this location at a three percent grade and filter through proposed permeable pavement. This treated water would discharge to one of the 60-inch RCP storm drains along Camino de la Reina via perforated pipe and PVC line. Basin 9 is a landscaped portion of the project site located along Camino de la Reina and surface flows towards the street, where it runs along curb and gutter towards an existing curb inlet northeast of the property. Basin 10 consists of the project's main driveway that leads to the parking garage, landscaping, and walkways. Impervious flow from the driveway would be routed to a bio-filtration basin within the landscaped area. Overflow would discharge to a 60-inch RCP storm drain on Camino de la Reina via PVC. Basins 11 and 12 include hardscape courtyards that flow towards bio-filtration basins. Basin 11 would overflow to a 60-inch RCP storm drain on Camino de la Reina via PVC, and basin 12 would overflow back to Camino De La

Reina via proposed storm drains along the main rear drive aisle proposed along the eastern portion of the project site. Basin 13 consists of the proposed pool area and drains towards a bio-filtration basin to the east, ultimately discharging to an existing curb inlet along Camino de la Reina. Basins 14 and 15 are landscaped areas that surface flow to Camino de la Reina and end in the same inlet as Basin 13. Basins 16 and 17 are considered to be de minims areas that would flow back to Camino de la Reina.

The peak runoffs discharged at each runoff location are listed below in Table 5.11-1, *Existing and Proposed Surface Runoff*.

Extraining o	The Contain	ions -														
Basin	Basin Area	Basin Acreage (A)	Pervious Area	Impervious Area	% Pervious	% Impervious	<sup>1</sup> Runoff Coefficient	<sup>2</sup> To	<sup>3</sup> Intensity 2-year	Q <sub>2</sub>	<sup>3</sup> Intensity 10-year	Q <sub>10</sub>	<sup>3</sup> Intensity 50-year	Q <sub>50</sub>	<sup>3</sup> Intensity 100-year	Q <sub>100</sub>
	(sf)	(ac)	(sf)	(sf)	%	%	(C)	(min)	(in/hr)	(cfs)	(in/hr)	(cfs)	(in/hr)	(cfs)	(in/hr)	(cfs)
1	82,578	1.90	23,185	59,393	28%	72%	0.85	6.2	2.30	3.71	3.25	5.24	3.95	6.36	4.00	6.45
2	36,626	0.84	11,350	25,276	31%	69%	0.50	5.0	2.40	1.01	3.40	1.43	4.10	1.72	4.40	1.85
3	14,476	0.33	10,045	4,431	69%	31%	0.85	5.0	2.40	0.68	3.40	0.96	4.10	1.16	4.40	1.24
4	80,792	1.85	27,535	53,257	34%	66%	0.85	5.6	2.25	3.55	3.30	5.20	4.00	6.31	4.15	6.54
Total	214,472	4.92	72,115	142,357	34%	66%				8.94		12.83		15.55		16.08
Proposed	Site Cond	itions														
Basin	Basin Area	Basin Acreage (A)	Pervious Area	Impervious Area	% Pervious	% Impervious	<sup>1</sup> Runoff Coefficient	<sup>2</sup> To	<sup>3</sup> Intensity 2-year	Q <sub>2</sub>	<sup>3</sup> Intensity 10-year	Q <sub>10</sub>	<sup>3</sup> Intensity 50-year	Q <sub>50</sub>	<sup>3</sup> Intensity 100-year	Q <sub>100</sub>
	(sf)	(ac)	(sf)	(sf)	%	%	(C)	(min)	(in/hr)	(cfs)	(in/hr)	(cfs)	(in/hr)	(cfs)	(in/hr)	(cfs)
1	13,794	0.32	0	13,794	0%	100%	0.85	5.0	2.40	0.65	3.40	0.92	4.10	1.10	4.40	1.18
2	7,014	0.16	0	7,014	0%	100%	0.85	5.0	2.40	0.33	3.40	0.47	4.10	0.56	4.40	0.60
3	26,337	0.60	0	26,337	0%	100%	0.85	6.8	2.20	1.13	3.20	1.64	3.90	2.00	4.20	2.16
4	13,260	0.30	0	13,260	0%	100%	0.85	8.8	2.00	0.52	3.00	0.78	3.70	0.96	4.00	1.03
5	10,488	0.24	0	10,448	0%	100%	0.85	5.0	2.40	0.49	3.40	0.70	4.10	0.84	4.40	0.90
6	20,176	0.46	0	20,176	0%	100%	0.85	8.1	2.10	0.83	3.10	1.22	3.80	1.50	4.10	1.61
7	8,353	0.19	1,915	6,438	23%	77%	0.85	5.0	2.40	0.39	3.40	0.55	4.10	0.67	4.40	0.72
8	34,071	0.78	13,115	20,956	38%	62%	0.85	5.0	2.40	1.60	3.40	2.26	4.10	2.73	4.40	2.93
9	27,006	0.62	1,558	25,448	6%	94%	0.10	9.3	1.95	0.12	2.95	0.18	3.50	0.22	3.75	0.23
10	10,842	0.25	1,534	9,308	14%	86%	0.85	5.0	2.40	0.51	3.40	0.72	4.10	0.87	4.40	0.93
11	6,761	0.16	735	6,026	11%	89%	0.85	6.4	2.20	0.29	3.20	0.42	3.90	0.51	4.20	0.55
12	7,667	0.18	0	7,667	0%	100%	0.85	5.0	2.40	0.36	3.40	0.51	4.10	0.61	4.40	0.66
13	6,415	0.15	1,354	5,061	21%	79%	0.85	5.0	2.40	0.30	3.40	0.43	4.10	0.51	4.40	0.55
14	14,236	0.33	13,545	691	95%	5%	0.10	5.0	2.40	0.08	3.40	0.11	4.10	0.13	4.40	0.14
15	5,338	0.12	5,338	0	100%	0%	0.10	5.0	2.40	0.03	3.40	0.04	4.10	0.05	4.40	0.05
16	1,259	0.03	510	749	41%	59%	0.85	5.0	2.40	0.06	3.40	0.08	4.10	0.10	4.40	0.11
17	1,455	0.03	777	678	53%	47%	0.85	5.0	2.40	0.07	3.40	0.10	4.10	0.12	4.40	0.12
Total	214,472	4.92	40,381	174,051	19%	81%				7.74		11.12		13.48		14.49
Change in Site Surface Runoff (CFS) -1.20 -1.71 -2							-2.07		-1.59							

Table 5.11-1.	Existing	and Pro	posed Si	irface	Runoff
	LAISCHIS	unu 110	poscu si	njucc	Nullojj

1. Runoff coefficients have been been determined by Table 3-1 in the San Diego County Hydrology Manual

2. See Existing and Proposed Tc Table for time of concentration calculations.

3. Intensity values have been calculated per the "Intensity-Duration Design Chart" figure 3-2 of the San Diego County Hydrology Manual.

The proposed project would reduce surface runoff in a potential 50-year and 100-year storm event. The proposed project would construct storm drains that would be sized to provide adequate capacity. No impacts associated with runoff and drainage would result.

### Significance of Impacts

Entering Otto Constitutions

The proposed project would result in an increase in impervious surfaces from what exists today. However, the project would result in an overall decrease in peak runoff. The project would install storm drains adequately sized to handle project runoff. No significant impacts associated with drainage and runoff would result.

#### **Mitigation Measures**

Development of the Alexan Fashion Valley project would not result in significant impacts to drainage and runoff. No mitigation measures are required.

#### Significance of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

#### <u>Issue 2</u>

Would the proposal result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?

Issue 2 addresses the following threshold of significance:

• If a project would result in modifications to existing drainage patterns, there may be significant impacts on environmental resources such as biological communities, archaeological resources, etc.

#### Impact Analysis

As discussed in *Issue 1*, above, the proposed project would result in an increase in impervious surfaces but an overall decrease in peak runoff compared to the existing conditions. The proposed project would provide for 13 additional drainage basins than what currently exists, but these additional basins would not result in a substantial alteration to on- or off-site drainage patterns. As such, impacts to drainage patterns would be less than significant.

#### Significance of Impacts

The proposed project would not result in a significant impact to drainage patterns. No mitigation would be required.

#### **Mitigation Measures**

Development of the Alexan Fashion Valley project would not result in significant impacts to drainage patterns. No mitigation measures are required.

### Significance of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

### <u>Issue 3</u>

Would the proposal develop wholly or partially within the 100-year floodplain identified in the FEMA maps or impose flood hazards on other properties?

Issue 3 addresses the following threshold of significance:

• If a project would result in increased flooding on- or off-site, there may be significant impacts on upstream or downstream properties and to environmental resources.

### Impact Analysis

As shown in Figure 5.11-2, *Project Site's Location in Relation to Special Flood Hazard Zone, t*he project site is located within the 100-year floodplain of the San Diego River. The entire project site is located within a Zone X floodplain, and the northeastern portion of the site is located in a Zone AE (100-year) floodplain of the San Diego River based on FEMA FIRM. As such, floodplain management and flood proofing within the City of San Diego shall be based upon existing conditions in accordance with the City Floodplain Management Requirements and FEMA regulations. Under 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 result in flood hazards to the project site or impose flood hazards on other properties, because the project development would elevate the project site out of the 100-year floodplain. No mitigation would be required.

### **Mitigation Measures**

Development of the Alexan Fashion Valley project would not result in significant impacts resulting from flooding. Therefore, no mitigation measures are required.

### Significance of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

**5.0 ENVIRONMENTAL ANALYSIS** 





Figure 5.11-2. Project Site's Location in Relation to Special Flood Hazard Zone

**5.0 ENVIRONMENTAL ANALYSIS** 

5.11 Hydrology



# 5.12 Water Quality

The analysis presented in this section is based on a *Preliminary Storm Water Quality Management Plan (SWQMP)*, dated November 22, 2016, prepared to comply with the requirements of the City of San Diego Storm Water Management and Discharge Control Ordinance. The SWQMP is included as Appendix K of this EIR.

# 5.12.1 Existing Conditions

Water quality is affected by sedimentation caused by erosion, runoff carrying contaminants, and direct discharge of pollutants. The increase in impervious surfaces generally associated with the development of land leads to increased opportunity for contaminated runoff that carries oils, heavy metals, pesticides, fertilizers, and other contaminants to enter a watershed.

The project site is situated north of the I-8/SR-163 interchange, south and east of Camino de la Reina, and west of SR-163, in the City of San Diego. It is situated within the San Diego Hydrologic Unit (No. 907.00), Lower San Diego Hydrologic Area (No. 907.10), and Mission San Diego Hydrologic Subarea (No. 907.11) per the Water Quality Control Plan for the San Diego Basin. Basin No. 907.11 is included in the most recent list of Clean Water Act Section 303(d) List of Water Quality Segments. The project site indirectly discharges to the San Diego River (Lower), which is impaired with enterococcus, fecal coliform, low dissolved oxygen, nitrogen, phosphorous, total dissolved solids, and toxicity.

### **BENEFICIAL USES**

According to the Regional Water Quality Control Board (RWQCB), the segment of the San Diego River located in Hydrologic Unit 907.11 and adjacent to the project site is classified as having the following beneficial uses:

- **Agricultural Supply (AGR):** Includes uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.
- **Industrial Service Supply (IND):** Includes uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.
- **Contact Water Recreation (REC-1):** Includes uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and SCUBA diving, surfing, white water activities, fishing, or use of natural hot springs.
- Non-Contact Water Recreation (REC-2): Includes the uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to,

picnicking, sunbathing, hiking, beachcombing, camping, boating, tide pool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.

- **Preservation of Biological Habitats of Special Significance (BIOL):** Includes uses of water that support designated areas or habitats, such as established refuges, parks, sanctuaries, ecological reserves, or Areas of Special Biological Significance (ASBS), where the preservation or enhancement of natural resources requires special protection.
- Warm Freshwater Habitat (WARM): Includes uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish or wildlife, including invertebrates.
- Wildlife Habitat (WILD): Includes uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.
- **Preservation of Rare and Endangered Species (RARE):** Includes uses of water that support habitats necessary for the survival and successful maintenance of plant or animal species established under state and/or federal law as rare, threatened, or endangered.

### 5.12.2 Impact Analysis

### Thresholds of Significance

The City of San Diego's "Significance Determination Guidelines under the California Environmental Quality Act" states the following with regards to significance thresholds for water quality:

• Compliance with the Water Quality Standards is assured through compliance with the City's Storm Water Standards of the Municipal Code and implementation of Best Management Practices (BMPs) as outlined in the Water Quality Technical Report. Compliance with the water quality standards is generally considered sufficient to preclude significant impacts. However, the size and location of this project warrants an evaluation of potential impacts in spite of adherence to the standards.

### <u>Issue 1</u>

Would the proposal result in an increase in pollutant discharge to receiving waters during or following construction? Would the proposed project discharge identify pollutants to an already impaired water body?

Issue 1 addresses the following threshold of significance:

• Compliance with the Water Quality Standards is assured through compliance with the City's Storm Water Standards of the Municipal Code and implementation of Best Management Practices (BMPs) as outlined in the Water Quality Technical Report. Compliance with the

water quality standards is generally considered sufficient to preclude significant impacts. However, the size and location of this project warrants an evaluation of potential impacts in spite of adherence to the standards.

### Impact Analysis

According to the City of San Diego's CEQA Significance Determination Thresholds, compliance with the Water Quality Standards is assured through permit conditions. As such, the water quality threshold is adherence to the City's Storm Water Standards Manual.

As stated above, the nearest 303(d) impaired water body within the Mission San Diego HSA (907.11) is the Lower San Diego River. The San Diego River (Lower) is impaired with enterococcus, fecal coliform, low dissolved oxygen, nitrogen, phosphorous, total dissolved solids, and toxicity.

The proposed project has the potential to affect water quality at the project site. Runoff from the project would eventually enter the Lower San Diego River, an identified impaired water body. The following categories of anticipated or potential pollutants have been identified as "pollutants of concern" based on a "residential" and "parking lots" proposed site use (see Appendix III):

- Sediments
- Nutrients
- Heavy metals
- Trash and debris
- Oxygen demanding substances
- Oil and grease
- Bacteria and viruses (potential)
- Pesticides

To address water quality for the project, BMPs would be implemented during construction and postconstruction activities. BMPs to control these general pollutants are described under *Issue 2*, below. Implementation of BMPs would treat storm water to meet City water quality objectives and avoid significant impacts.

### Significance of Impacts

Property modifications associated with the proposed project are not expected to substantially affect the quality of storm water runoff leaving this site compared to existing conditions, because the project would implement BMPs to minimize the impacts of post-construction activities on the quality and quantity of storm water to the maximum extent practicable. In addition, BMPs would be implemented to control the construction sources of potential storm water pollutants. Additionally, the proposed project would result in less runoff than what currently exists and would eliminate expanses of open parking areas that generate pollutants, therefore improving site conditions.

### **Mitigation Measures**

With implementation of the BMPs identified under *Issue 2*, below, the project would not result in significant impacts to water quality. No mitigation is required.

### Significance of Impacts Following Implementation of Mitigation Measures

No mitigation is required.

### <u>Issue 2</u>

What short-term and long-term effects would the proposed project have on local and regional water quality? What types of pre- and post-construction Best Management Practices (BMPs) would be incorporated into the project to preclude impacts to local and regional water quality?

Issue 2 addresses the following threshold of significance:

• Compliance with the Water Quality Standards is assured through compliance with the City's Storm Water Standards of the Municipal Code and implementation of Best Management Practices (BMPs) as outlined in the Water Quality Technical Report. Compliance with the water quality standards is generally considered sufficient to preclude significant impacts. However, the size and location of this project warrants an evaluation of potential impacts in spite of adherence to the standards.

### Impact Analysis

The proposed project is not expected to affect the quality of storm water runoff leaving the site in the near- or long-term. The proposed project would implement BMPs directed at precluding impacts to local and regional water quality. BMPs of the project are discussed below.

### SOURCE CONTROL BEST MANAGEMENT PRACTICES

The following source control BMPs are incorporated into the site design:

- 1. Maintenance Bays
  - There are no maintenance bays proposed as part of this development.
- 2. Vehicle and Equipment Wash Areas
  - There are no vehicle and equipment wash areas proposed as part of this development.
- 3. Outdoor Processing Areas
  - Where applicable, all stockpiled materials will be covered to prevent storm water contact.

- 4. Retail and Non-Retail Fueling Areas
  - There are no fueling areas proposed as part of this development.
- 5. Food Service
  - There are no food service uses being developed with this project.
- 6. Use Efficient Irrigation Systems and Landscape Design
  - The proposed development will utilize efficient design by proposing some or all of the below referenced systems:
  - Rain Shutoff Devices
  - Designing Irrigation Systems for individual area requirements
  - Flow Reducers or Shutoff Valves to control water loss in the event of broken heads or lines
- 7. Design Trash Storage Areas to Reduce Pollution Contribution
  - The proposed development will utilize trash enclosures with impervious surface, utilize lids on all trash containers and provide a roof to minimize contact with storm water. Trash areas for residential units will be enclosed within the parking structure.
- 8. Design Outdoor Materials Storage Areas to Reduce Pollution Contribution
  - All material that will need to be stored on-site will be protected via enclosure. If the material is considered hazardous, a secondary containment structure such as berm, dike or curb will be constructed to prevent leaks and spills in the event that the enclosure fails.
- 9. Design Loading Docks to Reduce Pollution Contribution
  - There are no loading docks proposed as part of this development.
- 10. Employ Integrated Pest Management Practices
  - Biological Control: Educational material will be distributed to all new residents regarding relying on natural enemies to eat pests.
  - Habitat Manipulation: Educational material will be distributed to all new residents regarding physical pest elimination techniques, such as weeding, squashing, trapping, washing, or pruning out pests.
  - Use of Resistant Plant Varieties: The proposed development will utilize and educational material will be distributed to all new residents regarding use of non-invasive resistant plant varieties.
  - Proper Use of Pesticides as a last line of defense: Educational material will be distributed to all new residents.

- 11. Provide Storm Water Conveyance System Stamping and Signage
  - Stamping or equivalent will be provided at all on-site storm drain inlet openings.
- 12. Manage Fire Sprinkler System Discharges
  - The proposed development will incorporate fire sprinklers that will discharge into the sanitary sewer during routine maintenance.
- 13. Prevention of Illicit Discharges
  - The proposed development will prevent illicit discharges into the MS4.
- 14. On-site storm drain inlets
  - The proposed development will construct on-site storm drain inlets where necessary.
- 15. Other Source Control Requirements
  - The project will abide by all post-construction soil stabilization practices in conformance with the approved Grading and Landscaping Plans
  - The proposed development will provide trash receptacles in areas of high pedestrian traffic.
- 16. Interior floor drains and elevator shaft sump pumps
  - The proposed development would provide interior floor drains and elevator shaft pumps where necessary.
- 17. Interior parking garages
  - The proposed development would construct an interior parking garage.
- 18. Pools, spas, ponds, decorative fountains, and other water features
  - The proposed development would include pools, spas, ponds, decorative fountains, and other water features in the site design. All of these would be constructed with flow reducers or shutoff valves to control water loss in the event of broken heads or lines

### SITE DESIGN BEST MANAGEMENT PRACTICES

The following site design BMPs are incorporated into the site design:

- 1. Maintain Natural Drainage Pathways and Hydrologic Features
  - The proposed development would not include natural drainage pathways and hydrologic features.

- 2. Minimize Impervious Area
  - The proposed development proposes multi-story structures to increase building density.
  - The majority of parking for the project would be within a parking garage.
- 3. Runoff Collection
  - The proposed project would include 12 drainage basins.
  - Impervious runoff will be directed to nine flow-through planters throughout the site.
- 4. Impervious Area Dispersion
- 5. Minimize Soil Compaction
  - Soil Compaction of landscaped areas will not be proposed due to the location of the landscaped areas in relation to the proposed structures.
  - Soil Amendments are not proposed for this development due to the location of the landscaped areas in relation to the proposed structures.
- 6. Landscaping with Native or Drought Tolerant Species
  - Landscaping plan includes the use of indigenous and/or drought tolerant plant material. No invasive or potentially invasive species would be utilized.
- 7. Harvesting and Using Precipitation

### STRUCTURAL BEST MANAGEMENT PRACTICES

**BMP** Selection:

- 1. Biofiltration basins would be utilized to treat storm water for this site.
- 2. Nine planter locations are proposed to treat roof runoff, along with permeable pavement for drive aisle runoff.

### Significance of Impacts

Implementation of the proposed BMPs would preclude significant potential impacts to water quality.

### **Mitigation Measures**

The project incorporates BMPs that minimize potential impacts to water quality to below a level of significance. No mitigation is required.

### *Significance of Impacts Following Implementation of Mitigation Measures* No mitigation is required.

# 5.13 Public Services and Facilities

Public services and facilities are those functions that serve development on a community-wide basis. These functions include police, fire and emergency response services, parks and recreation, schools, and libraries. The following discussion is based on correspondence with service providers (see Appendix I) and evaluates the potential impacts the proposed project would have upon existing services. Figure 5.13-1, *Location of Public Services*, shows the location of the public services and facilities that serve the project site.

# 5.13.1 Existing Conditions

### POLICE PROTECTION

Police protection for the Alexan Fashion Valley project is provided by the San Diego Police Department (SDPD). The SDPD is divided into nine divisions. The project site is serviced by the Western Division. The Western Division, located at 5212 Gaines Street, 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.

### FIRE PROTECTION AND EMERGENCY SERVICES

Fire protection and emergency services are provided by the San Diego Fire-Rescue Department (SDFD), which serves a total area of approximately 331 square miles, a population of 1,337,000, and 17 miles of coastline extending three miles offshore. SDFD is a multi-faceted organization that provides City residents with fire and life-saving services including fire protection, emergency medical services, and lifeguard protection at San Diego beaches.

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. Fire Station 5 currently serves the existing project site, and would continue to be the primary station servicing the proposed project site. Station 5, which is approximately 1.2 miles southeast from the proposed project, is located at 3902 9<sup>th</sup> Avenue and serves Hillcrest and its surrounding areas. Station 5's district is 4.12 square miles (City of San Diego Fire-Rescue, 2013). This station includes a fire engine and a battalion chief's vehicle, and has no paramedic unit. Additional fire stations that provide fire and emergency services for the project site include:

- Fire Station 8 located at 3974 Goldfinch Street
- Fire Station 14 located at 4011 32<sup>nd</sup> Street

- Fire Station 20 located at 3305 Kemper Boulevard
- Fire Station 23 located at 2190 Comstock Street
- Fire Station 25 located at 1972 Chicago Street

### SCHOOLS

Public school service within the project area is provided by San Diego Unified School District (SDUSD). There are no public schools located within Mission Valley. The project site would be served by Carson Elementary, located at 6905 Kramer Street, approximately 1.6 miles north of the project site; Montgomery Middle School, located at 2470 Ulric Street, approximately 2.1 miles north of the project site; and Kearny High Complex, located at 7651 Wellington Street, approximately four miles north of the project site.

### LIBRARY

Library services are provided by the San Diego Public Library (SDPL). Mission Valley is served by the Mission Valley Branch of the SDPL, located at 2123 Fenton Parkway, approximately three miles east of the project site. The Mission Valley Branch library is a 19,760 square-foot facility that opened in 2002 and serves an estimated population of 14,698 (2010). The Library includes a large community meeting room, seminar rooms, a children's library, an outdoor patio with a children's garden which has a flowing river sculpture, a computer lab, and a mezzanine and terrace. Additionally, two other City of San Diego Public Library branches are located close to the project site: the Mission Hills Library located at 925 W. Washington Street, approximately 1.1 miles from the proposed project, and the University Heights Library located at 4193 Park Boulevard, approximately 1.3 miles from the proposed project.

### RECREATION

Mission Valley contains one public recreational facility, Sefton Field, which houses four little league fields approximately 1.5 miles west of the project site. Recently, the City approved the San Diego River Park Master Plan. A major portion of the San Diego River Park Master Plan is within the Mission Valley community. When fully implemented, the San Diego River Park will provide great natural park for the City. The San Diego River Park Master Plan envisions a waterway that is healthy, accessible to the public, and inhabited with wildlife. The plan provides guidance on how the San Diego River can be reasserted as the focus of the river valley and become an asset to the community. Included as part of the San Diego River Park Master Plan is an integrated and connected trail system, which will provide additional opportunities for recreation along the San Diego River.

Additionally, the San Diego River Park runs partially through Mission Valley along the San Diego River. The San Diego River Park stretches from the Pacific Ocean at Ocean Beach Park to the City's jurisdictional eastern boundary at the City of Santee, a total of 17.5 miles. When fully realized, the

San Diego River Park will provide continuous active and passive recreation along the San Diego River in the form of multi-modal paths and viewing areas.

### 5.13.2 Impact Analysis

### Thresholds of Significance

The City of San Diego's *California Environmental Quality Act Significance Thresholds* (January 2011) provides guidance to determine potential significance associated with pubic services and facilities. Based on the City's thresholds for impacts to public services and facilities, a project may result in a significant impact if the proposed project would:

- Result in the need for new or expanded public facilities, including fire protection, police protection, health, social services, emergency medical, libraries, schools, and parks;
- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- Include recreational facilities or require the construction or expansion of recreation facilities, which might have an adverse physical effect on the environment.

### <u>Issue 1</u>

Would the proposal have a substantial effect upon, or result in a need for new or altered governmental services in any of the following areas: Police protection; Fire/Life Safety protection; Libraries; Parks or other recreational facilities; Maintenance of public facilities, including roads, and Schools?

Issue 1 above addresses the following thresholds of significance: A project may result in a significant impact if the proposed project would:

- Result in the need for new or expanded public facilities, including fire protection, police protection, health, social services, emergency medical, libraries, schools, and parks;
- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- Include recreational facilities or require the construction or expansion of recreation facilities, which might have an adverse physical effect on the environment.

### Impact Analysis

### POLICE

Police protection for the Alexan Fashion Valley project would be provided by the San Diego Police Department. The project site is served by the Western Division police facility, located at 5212 Gaines Street. The Western Division provides police services for the communities 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 is currently staffed with 108 sworn personnel and two civilian employees. Officers work ten-hour shifts. Staffing is comprised of three shifts, which operate from 6:00 AM -4:00 PM (First Watch), 2:00 PM – Midnight (Second Watch), and from 9:00 PM - 7:00 AM (Third Watch). Using the Department's recommended staffing guidelines, Western Division currently deploys a minimum of 15 patrol officers on First Watch, 18 patrol officers on Second Watch, and 11 patrol officers on Third Watch.

The San Diego Police Department does not staff individual stations based on ratios of sworn officers per 1,000 population. The goal citywide is to maintain 1.48 officers per 1,000 population. The Department is currently staffing 1.3 sworn officers per 1,000 residents based on 2016 estimated citywide resident population of 1,391,676. There are no current plans for additional police sub-stations in the project area. Correspondence with SDPD notes that police response times in the Mission Valley community will continue to increase with build-out community plans and the increase of traffic generated by new growth. (SDPD, January 27, 2017.)

The Department currently utilizes a five-level priority call dispatch system, which includes priority E (Emergency), one, two, three and four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the call priority as necessary based on the information received. Priority E and priority one calls involve serious crimes in progress or those with a potential for injury. Priority two calls include vandalism, disturbances and property crimes. Priority three includes calls after a crime has been committed such as cold burglaries and loud music. Priority four calls include parking complaints or lost and found reports.

Table 5.13-1, *Western Division Call Priority Response Times*, below lists the department's response-time guidelines, the 2012 citywide average response times for each priority call level, and the 2012 average response times for each priority level call within Beat 623. As indicated in Table 5.13-1, average response times for Beat 623 are below the Police Department goals for priority call types E, 1, 2, and 3, and exceed the Police Department goals for priority 4 calls. The Department strives to maintain the response time goals identified in Table 5.13-1 as one of various other measures used to assess the level of service to the community.

Call Priority	Department Goal Response Times	2012 Citywide Average Response Times	2012 Beat 623 Average Response Times	
Priority E- Imminent threat to life	Within 7 minutes	6.3 minutes	6.6 minutes	
Priority 1- Serious crimes in progress	Within 14 minutes	11.8 minutes	13.4 minutes	
Priority 2- Less serious crimes with no threat to life	Within2 7 minutes	25.2 minutes	37.3 minutes	
Priority 3 –Reported after a crime has been committed	Within 70 minutes	61.9 minutes	108.8 minutes	
Priority 4- Parking complaints and lost and found report	Within 70 minutes	67.4 minutes	116.9 minutes	

### Table 5.13-1. Western Division Call Priority Response Times

Source: SDPD; January 27,2017

### FIRE RESCUE

The proposed project site is located within the service area of the City of San Diego Fire-Rescue Department. The City Fire-Rescue Department serves a total area of approximately 331 square miles, a population of 1,337,000, and 17 miles of coastline extending three miles offshore (City of San Diego Fire-Rescue, 2013). Two fire stations serve the project site. Station Number 45 is located 9366 Friars Road, approximately three miles east of the project site. Station 45 is equipped with an engine. Fire Station 5 currently serves the existing project site, and would continue to be the primary station servicing the proposed project site. Station 5, which is approximately 1.2 miles southeast from the proposed project, is located at 3902 9<sup>th</sup> Avenue and serves Hillcrest and its surrounding areas. Station 5's district is 4.12 square miles (City of San Diego Fire-Rescue, 2013). This station includes a fire engine and a battalion chief's vehicle, and has no paramedic unit. Additional fire stations that provide fire and emergency services for the project site include:

- Fire Station 8 located at 3974 Goldfinch Street
- Fire Station 14 located at 4011 32<sup>nd</sup> Street
- Fire Station 20 located at 3305 Kemper Boulevard
- Fire Station 23 located at 2190 Comstock Street
- Fire Station 25 located at 1972 Chicago Street

In June 2011, the City adopted the recommendations of the Fire Service Standards of Response Coverage Deployment Study for the City of San Diego Fire-Rescue Department Report, also known as the Citygate Report. Noted in the Citygate Report, a future fire station is planned for the west side of Mission Valley to cover gaps in response to this overall area. Response time estimates for the proposed project, located at 350 Camino de la Reina, are calculated using San Diego Fire-Rescue 911 Computer Aided Dispatch System (CAD) point-to-point routing. This application uses the road network generating the closest path from the fire station address to the requested location. Table 5.13-2, *Responding Vehicles and Response Times*, provides the response times (including dispatch and turnout) for the fire stations servicing the project site.

Table 5.15-2. Responding venicles and Response Times								
Responding Vehicle	Fire Station	Address	Response Time (minutes)					
Engine 5	Station 5	3902 9 <sup>th</sup> Avenue	7.0					
Engine 8	Station 8	3974 Goldfinch Street	8.3					
Engine 23	Station 23	2190 Comstock Street	8.4					
Engine 20	Station 20	3305 Kemper Boulevard	8.4					
Truck 20	Station 20	3305 Kemper Boulevard	8.4					
Truck 14	Station 14	4011 32 <sup>nd</sup> Street	9.8					
Battalion Chief 2	Station 5	3902 9 <sup>th</sup> Avenue	7.0					
Battalion Chief 3	Station 25	1972 Chicago Street	9.7					

### Table 5.13-2. Responding Vehicles and Response Times

In June 2011, the City adopted the recommendations of the Fire Service Standards of Response Coverage Deployment Study for the City of San Diego Fire-Rescue Department Report, also known as the Citygate Report. For fire operations to the site, the effectiveness of San Diego Fire-Rescue is directly correlated to speed and weight of response. Speed being measured in response time; and weight being measured in personnel/equipment. Response times greater than 7 minutes and 30 seconds place the public at risk of exponential fire growth or death if breathing has halted.

Based on the Citygate Report, the City adopted the performance measure that first due-units to treat medical patients and control small fires should arrive within 7.5 minutes 90 percent of the time from the receipt of the 911 call in fire dispatch (Citygate 2011, City of San Diego 2011). This equates to a one-minute dispatch time, 1.5-minute company turnout time and five-minute drive time in the most populated areas. To confine fires near the room of origin, stop wildland fires to under three acres when noticed promptly, and treat up to five medical patients at once, a multiple unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911 call receipt in fire dispatch 90 percent of the time. This equates to a one-minute dispatch time, 1.5-minute company turnout time, and eight-minute drive time spacing for multiple units in the most populated areas. The number of responses would increase for the project site as a result of the proposed project. (Larry Trame, e-mail correspondence, April 5, 2017.)

### SCHOOLS

The project site would be served by Carson Elementary School, Montgomery Middle School, and Kearny High Complex. No schools serving the project site are currently over capacity. Additionally, relative to school facilities, Carson Elementary has two portable and 32 permanent classrooms, Montgomery Middle has zero portable and 43 permanent classrooms, and Kearny High Complex has eight portable and 64 permanent classrooms. There are no identified deficiencies at these schools.

Student generation rates vary based on the type of project, number of units, bedroom mix, neighborhood, and other factors. In order to estimate the number of students generated by the Alexan Fashion Valley project, existing similar developments in the project vicinity were referenced, as well as the number of units provided by the proposed project.

Based on the existing similar projects, proposed student generation rates for the proposed project are shown in Table 5.13-3, *Estimated Generation Rates for Alexan Fashion Valley Project*. Student generation rates are the average from the existing developments noted above, with a low and high range.

Proposed Development	Address	Number of Units	Student Generation Rate	Estimated Number of Students	
Alexan Fashion Valley Project	123 Camino de la Reina San Diego, CA 92108	284	K-5: 0.036-0.073 6-8: 0.003-0.006 9-12: 0.012-0.024 <b>K-12: 0.051-0.103</b>	K-5: 10-20 6-8: 1-2 9-12: 3-7 <b>K-12: 14-29</b>	

Table 5.13-3. Estimated Generation Rates for Alexan Fashion Valley Project

Based on the above information, the number of students generated by the proposed project is not specifically expected to be significant and would not be expected to have an adverse impact upon district schools. Impacts to schools would be less than significant.

### LIBRARY

As noted above, Mission Valley is served by the Mission Valley Branch of the SDPL. The project involves the development of 284 residential units. Although it would provide an increase in population, it would not adversely affect existing levels of library facilities to the area, and it would not require the construction of new or expanded library facilities. No impacts would occur.

### RECREATION

As noted above, Mission Valley contains one public recreational facility in the form of a little league baseball facility. The proposed 284 residential units will be subject to the City's General Plan population-based park standards of a total of 2.8 usable acres of population-based parks per 1,000 residents; a Recreation Center for every 25,000 residents; and an Aquatics Complex for every 50,000 residents. The dwelling units proposed by the development are consistent with the Mission Valley Community Plan, therefore park facility requirements will be satisfied through payment of the per-unit DIF at the time of Building Permit Issuance. The proposed project would not result in impacts to recreational facilities.

### Significance of Impacts

The project would not result in significant impacts to police protection, fire/life safety protection, libraries, parks, or other recreation facilities, and schools.

#### **Mitigation Measures**

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

### Significance of Impacts Following Implementation of Mitigation Measures

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



# 5.13 Public Services and Facilities

Figure 5.13-1. Location of Public Services

# 5.14 Public Utilities

Public utilities include water, sewer, storm water drainage, and solid waste management on a community- wide basis. These services would be provided to future residents, employees, and visitors to the Alexan Fashion Valley project. (*NOTE:* Public utilities also include the provision of electricity and natural gas resources which would provide energy to the proposed project. SDG&E will provide electricity and natural gas service to the project. Please see Section 5.6, *Energy*, for a discussion of SDG&E's ability to serve the project and the project's potential impact on energy resources.) Public utilities providers were contacted during preparation of this EIR to identify potential impacts the Alexan Fashion Valley project would have on utilities.

A *Waste Management Plan* was prepared for the project by KLR Planning (July 2016). The purpose of this Waste Management Plan (WMP) was to provide analysis of the solid waste impacts anticipated for the Alexan Fashion Valley project and how these impacts would be mitigated. The WMP identifies sufficient mitigation to reduce the potential impacts of the Alexan Fashion Valley project on solid waste generation. The *Waste Management Plan* has been included as Appendix J of this EIR.

The following discussion is based on the various studies listed above and correspondence with utility company providers.

### 5.14.1 Existing Conditions

### WATER

**Public Utilities Department.** The Alexan Fashion Valley project is located within the service area of the City's Public Utilities Department. The Public Utilities Department treats and delivers more than 200,000 acre-feet per year (AFY) of water to more than 1.3 million residents. The water system extends over 404 square miles, including 342 square miles within the City of San Diego. The Public Utilities Department's potable water system serves the City of San Diego and certain surrounding areas, including both retail and wholesale customers. In addition to delivering potable water, the City has a recycled water program. The City's objectives relative to the water system are to optimize the use of local water supplies, lessen the reliance on imported water, and free up capacity in the potable water system. Recycled water provides the City with a dependable, year-round, locally produced, and controlled water resource.

The Public Utilities Department relies on imported water as its major water supply source and is a member public agency of the San Diego County Water Authority (SDCWA). The SDCWA is a member agency of the Metropolitan Water District (MWD). The statutory relationships between the SDCWA and its member agencies, and MWD and its member agencies, respectively, establish the scope of the Public Utilities Department's entitlements to water from these two agencies. The Public Utilities

Department currently purchases approximately 85 to 90 percent of its water from the SDCWA, which supplies the water (raw and treated) through two aqueducts consisting of five pipelines. While the Public Utilities Department imports a majority of its water, it uses three local supply sources to meet or offset potable demands: local surface water, conservation, and recycled water.

**Metropolitan Water District.** The MWD was formed in 1928 to develop, store, and distribute supplemental water in southern California for domestic and municipal purposes. The MWD is a wholesale supplier of water to its member agencies. It obtains supplies from local sources as well as the Colorado River via the Colorado River Aqueduct, which it owns and operates, and the Sacramento-San Joaquin Delta via the State Water Project. Planning documents such as the Regional Urban Water Management Plan (RUWMP) and Integrated Water Resources Plan (IWRP) help ensure the reliability of water supplies and the infrastructure necessary to provide water to Southern California. MWD's 2010 RUWMP documents the availability of these existing supplies and additional supplies necessary to meet future demands. The 2010 RUWMP includes the resource targets included in the IWRP and contains a water supply reliability assessment that includes a detailed evaluation of the supplies necessary to meet demands over a 25-year period in average, single-dry year and multiple-dry year periods. As part of this process, MWD also uses SANDAG's regional growth forecast in calculating regional water demands. In accordance with state law, the RUWMP is updated every five years.

MWD's IWRP identifies a mix of resources (imported and local) that, when implemented, will provide 100 percent reliability for full-service demands through the attainment of regional targets set for conservation, local supplies, State Water Project supplies, Colorado River supplies, groundwater banking, and water transfers. The latest IWRP (2010) includes a planning buffer to mitigate against the risks associated with implementation of local and imported supply programs. The planning buffer identifies an additional increment of water that could potentially be developed if other supplies are not implemented as planned. The planning buffer is intended to ensure that the southern California region, including the City of San Diego, will have adequate water supplies to meet future demands.

**San Diego County Water Authority.** The SDCWA purchases water from the MWD that is delivered to the region through two aqueducts. Of the MWD's 24 member agencies, the SDCWA is the largest member agency in terms of deliveries and purchases about 25 percent of all the water the MWD delivered in fiscal year 2007. As a retail member agency of the SDCWA, the Public Utilities Department purchases water from the SDCWA for retail distribution within its service area.

The SDCWA's 2010 Urban Water Management Plan (UWMP), in accordance with State law and the RUWMP, contains a water supply reliability assessment that identified a diverse mix of imported and local supplies necessary to meet demands over the next 25 years in average, single-dry year and multiple-dry year periods. The UWMP is based on SANDAG's 2050 Regional Growth Forecast, which

has been refined to include an economic outlook that factors in the current recession and local jurisdictions' general/specific plan updates. The UWMP documents that no shortages are anticipated within its service area. The SDCWA also prepared an annual water supply report for use by its members that provides updated documentation on existing and projected water supplies.

The SDWCA's 2010 UWMP provides for a comprehensive planning analysis at a regional level and includes water use associated with accelerated forecasted residential development as part of its municipal and industrial sector demand projections. These housing units were identified by SANDAG in the course of its regional housing needs assessment, but are not yet included in existing general land use plans of local jurisdictions. The demand associated with accelerated forecasted residential development is intended to account for SANDAG's land use development currently projected to occur between 2035 and 2050, but has the likely potential to occur on an accelerated schedule. SANDAG estimates that this accelerated forecasted residential development could occur within the planning horizon (2010 to 2035) of the 2010 UWMP. These units are not yet included in local jurisdiction's general plans, so their project demands are incorporated at a regional level. When necessary, this additional demand increment, termed Accelerated Forecasted Growth, can be used by member agencies to meet demands of development projects not identified in the general land use plans.

**Challenges to Regional Water Supply.** Water supply for southern California faces many shortterm and long-term challenges, including restrictions for endangered species and other environmental protections, droughts, funding shortfalls for new projects, climate change, and others. The Public Utilities Department, SDCWA, and MWD prepare and revise their water supply and management plans as needed to ensure their continuing ability to serve the water supply needs of the region. These agencies continue to adopt measures and develop new programs, policies, and projects to provide a greater degree of certainty during periods of prolonged drought or to offset possible reductions in other sources of supply.

Operation of the State Water Project along with the Central Valley Project in the San Joaquin Valley was challenged in 2007 in efforts to protect endangered species and habitat, resulting in reduction in the water delivery capacity of both projects. In efforts to ensure reliability of the Sacramento–San Joaquin Delta water supply, the MWD adopted a Delta Action Plan as a framework to address water supply risks in the Sacramento–San Joaquin Delta both for the near-, mid-, and long-term. In the near-term, MWD will continue to rely on plans and polices outlined in its RUWMP and IWRP to address water supply shortages and interruptions to meet water demands. Campaigns for voluntary water conservation, curtailment of replenishment water, and agricultural water delivery are some of the actions outlined in the RUWMP. If necessary, reduction in municipal and industrial water use and mandatory water allocation could also be implemented. MWD also entered into a series of agreements to ensure the stability of its Colorado River supplies and to gain substantial storage

capacity in years with surplus supplies. As a result, MWD's water supply is anticipated to be restored to previous levels in the future.

At the local level, the SDCWA is in the process of minimizing the amount of water it purchases from MWD by diversifying its water supply portfolio. The SDCWA intends to increase its local water supplies to 40 percent of the region's water supplies by 2020 through conservation programs, recycling, and groundwater development projects.

In addition, the Public Utilities Department emphasizes the importance of water conservation to minimize water demand and avoid excessive water use. In accordance with Municipal Code Section 147.04, all residential, commercial, and industrial buildings, prior to a change in ownership, are required to be certified as having water-conserving plumbing fixtures in place.

Also, in accordance with the Conservation Element of the City's General Plan (Policy CE-A.11), development projects shall implement sustainable landscape design such as planting "deciduous shade trees, evergreen trees, and drought-tolerant native vegetation, as appropriate, to contribute to sustainable development goals" and using "recycled water to meet the needs of development projects to the maximum extent feasible" to aid in water conservation.

The Public Utilities Department's Water Conservation Program, established in 1985, accounts for approximately 32,000 AF of potable water savings per year. These savings have been achieved through creation of a water conservation ethic, and implementation of programs, policies, and ordinances designed to promote water conservation practices, including irrigation management. These programs undergo periodic reevaluation to ensure realization of forecasted savings. The Public Utilities Department also examines new water saving technologies and annually checks progress toward conservation goals, working collaboratively with the MWD and SDCWA to formulate new conservation initiatives.

**Global Climate Change.** The MWD's sources of water supply could be negatively impacted by global climate change and associated challenges, including, but not limited to: reduction in the average annual snow pack; changes in the timing, intensity, location and amount, and variability in precipitation; long-term changes in watershed vegetation and increased incidence of wildfires; rise in sea level; increased water temperatures; and changes in urban and agricultural water demand.

While the impacts of global climate change on MWD's water supply cannot be meaningfully quantified at this time, MWD has taken actions to decrease potential impacts of climate change on the reliability of its water supplies, which are reflected in its IWRP and RUWMP. In addition to policies emphasizing diversification and adaptability of supply sources to manage uncertainties, current MWD water supply planning stresses the importance of local water supplies such as conservation, water reclamation, and groundwater recharge, which would be less affected by global climate

change. MWD has also entered into agreements to store water in groundwater reservoirs within and outside southern California.

The SDCWA is currently in the planning phase for projects to obtain potable water from ocean desalinization plants, which would relieve pressure on imported water sources and expand the local water supply.

**Water Supply Assessment (WSA) and Verification.** California State SB 221 and SB 610 went into effect January 2002 with the intention of linking water supply availability to land use decisions made by cities and counties. SB 610 requires water suppliers to prepare a WSA report for inclusion by land use agencies within the CEQA process for new developments subject to SB 221. SB 221 requires water suppliers to prepare written verification that sufficient water supplies are planned to be available prior to approval of large-scale subdivisions. As defined in SB 221 and SB 610, large-scale projects include residential development projects of more than 500 residential units and/or shopping centers or businesses employing more than 1,000 people or having more than 500,000 square feet of floor space. The project proposes 284 residential units, 8,480 square feet of commercial office space, and 3,275 square feet of restaurant space, replacing the existing 69,651 square feet of commercial use. The project does not meet the threshold of SB610 and SB221 and, therefore, a WSA and verification is not required for the proposed project.

### SEWER

Wastewater treatment service is provided by theSan Diego Public Utilities Department (PUD), which operates the Metropolitan Sewerage System (Metro System). Facilities in the Metro System include the Point Loma Wastewater Treatment Facility, ocean outfall pipes, pump stations, interconnecting interceptor sewers, and the North City and South Bay Water Reclamation Plants.

The Metro System provides wastewater transportation, treatment, and disposal services to the San Diego region. The system serves a population of 2.0 million from 16 cities and districts generating approximately 190 million gallons of wastewater per day (mgd). Planned improvements to the existing facilities will increase wastewater treatment capacity to serve an estimated population of 2.9 million through the year 2050. Nearly 340 mgd of wastewater will be generated by that year.

The PUD treats the wastewater generated in a 450-square mile area stretching from Del Mar and Poway to the north, Alpine and Lakeside to the east, and south to the Mexican border. The Point Loma Wastewater Treatment Facility currently treats approximately 175 mgd, with a capacity of 240 mgd. Sewer facilities have been built at the project site to serve the existing development.

### STORM DRAINAGE

The project site is situated north of the Interstate I-8/SR-163 interchange, south and east of Camino de la Reina, and west of SR-163, in the City of San Diego. The project site is fully developed with an

existing office building, surface parking and drive aisle, and landscaping. As presented in section 5.11 *Hydrology*, existing storm water runoff sheet flows are conveyed through on-site storm drains, currently discharging into curb inlets on Camino de la Reina before entering the existing storm drain system in Camino de la Reina.

### SOLID WASTE SERVICES

The City provides refuse collection for single- and multi-family residences located on public streets that meet City safe storage and access requirements; collection services for all other waste generators must be provided by franchised private hauling companies.

City of San Diego Environmental Services Department pursues waste management strategies that emphasize waste reduction and recycling, composting, and environmentally-sound landfill management to meet the City's long-term management needs. The State of California mandated (AB 939/PRC 41730 et seq.) in 1989 that all cities reduce waste disposed of in landfills by 25 percent by 1995 and 50 percent by the year 2000 (using 1990 as a base year for waste generation data). Assembly Bill 341 has set a target of 75 percent minimum diversion rate. ESD developed a Source Reduction and Recycling Element (SRRE), as required by the PRC, to reduce wastes deposed of in landfills by 50 percent compared to 1990 base year tonnages. The SRRE describes the programs, activities, and strategies the City plans to carry out to achieve the mandated waste reduction and is updated each year in annual reports to CalRecycle.

Solid waste generated by the project during the occupancy phase would be hauled away by private collection services from franchised haulers for the City of San Diego. The waste would be taken to either the City of San Diego's West Miramar Landfill, which is located north of Highway 52 at 5180 Convoy Street in San Diego; the Sycamore Sanitary Landfill, located at 8514 Mast Boulevard in San Diego; or the Otay Landfill, located at 1700 Maxwell Road in Chula Vista.

Waste generated by the project that cannot be reduced, recycled, or otherwise diverted to beneficial use is expected to be transported to and disposed of at the West Miramar Landfill. Yearly, almost 910,000 tons of waste are disposed of at the West Miramar Landfill. The landfill is projected to reach capacity in 2025.

Currently, only two other landfills provide disposal capacity within the urbanized region of San Diego: the Sycamore and Otay Landfills. The Sycamore Landfill contains 324 disposal acres on a 491acre site and is located to the east of Miramar, within the City of San Diego's boundaries. The Otay Landfill contains 230 disposal acres on a 464-acre site and is located within an unincorporated island of County land in the City of Chula Vista. The Sycamore and Otay Landfills are privately owned by Allied Waste Industries, Inc. The Sycamore Landfill is permitted to receive a maximum of 5,000 tons per day. The permitted capacity of the Sycamore landfill is 71,233,171 cubic yards, and its remaining capacity as of December 31, 2014, was 39,608,998 cubic yards. This landfill is projected to cease operation on December 31, 2042. The Otay Landfill is permitted to receive 8,000 tons per day. Its permitted capacity is 87,760,000 cubic yards, with a remaining capacity of 15,527,878 cubic yards on June 30, 2014. It is estimated that the Otay Landfill will cease operation on August 31, 2025(CalRecycle 2017.)

The solid waste management system infrastructure provides an essential public service to the citizens of California. There are three basic components in the solid waste management system: collection; processing to remove recyclable and compostable materials; and disposal of waste that cannot be recycled. These three components, coupled with the implementation of waste reduction and recycled material market development programs, ensure that the integrity of the solid waste management system is well maintained for the citizens of California.

**Collection**. Timely and adequate collection of solid waste protects public health and safety, and the environment. An effective collection system prevents unsightly, vector-propagating, and odorous waste accumulation outside residences and businesses. This also results in minimizing illegal disposal, discharge of waste to surface water bodies, and impacts to ecologically sensitive habitats. The effectiveness of California's recycling efforts begins at the source of generation, at the households and businesses, where many collection companies provide multiple bins that allow source separation of recyclables and green waste from the waste stream. Public education and outreach programs are essential elements of the solid waste management system, which brings awareness to the public in their recycling efforts and the positive outcomes achieved.

**Disposal Facilities**. California's landfills are considered among the best in the nation with respect to innovation, technology, and effectiveness in protecting the environment. Due to potential environmental impacts of landfills, the state's disposal system is heavily regulated by a multitude of regulatory agencies. As a result, landfill operators are required to implement best management practices and abide by permit conditions that ensure environmentally safe and sound operation of their landfills now and into the future.

**Policies and Programs.** Although user fees are limited in the City of San Diego, for the rest of California user fees have been the primary funding source for development of California's solid waste management system infrastructure and for implementation of waste reduction programs and educational campaigns. Volatile worldwide recycling markets continue to contribute to financial uncertainty and operational difficulty in local recycling programs. In addition, the solid waste infrastructure continues to be challenged with new regulations and mandates, making it even more costly and difficult to see positive growth. These fiscal constraints, coupled with reduced public acceptance of new solid waste management facilities, will require decision-makers to continue finding creative solutions to meet solid waste management needs.

A WMP has been prepared for the proposed project. The purpose of the WMP for the Alexan Fashion Valley project in the City of San Diego is to provide analysis of the solid waste impacts anticipated for the Alexan Fashion Valley project and how these impacts would be mitigated. The goal of the WMP is to identify sufficient mitigation to reduce the potential impacts of the Alexan Fashion Valley project on solid waste generation. In accordance with Council Policy 900-16, this goal would be met by striving for recycling of 100 percent of inert construction materials and striving for recycling a minimum 75 percent by weight all other materials. The Alexan Fashion Valley WMP has been approved as part of the project entitlements.

### 5.14.2 Impact Analysis

### Thresholds of Significance

The City of San Diego's *California Environmental Quality Act Significance Thresholds* (January 2011) provides guidance to determine potential significance associated with hydrology and water quality. Based on the City's *California Environmental Quality Act Significance Thresholds*, for impacts to public utilities, a project may result in a significant impact if it meets one or more of the following criteria:

Water

- If a project would use excessive amounts of potable water.
- If a project proposes predominantly non-drought resistant landscaping and excessive water usage for irrigation and other purposes.
- If a project would result in a need for new systems, or require substantial alterations to existing water utilities which would create physical impacts.

### Water Supply

For certain types of large projects, SB 610 requires that the environmental document prepared for each project contain a discussion regarding the availability of water to meet the projected water demands of the project for a 20-year planning horizon, including single and multiple dry years. Prior to approving a project, SB 221 requires the decision-maker to make a finding that the project's water demands for the planning horizon will be met.

The types of projects subject to SB 610 and SB 221 are the following:

- Residential developments of more than 500 units;
- Shopping centers or businesses employing more than 1,000 people or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 people or having more than 250,000 square feet of floor space;
- Hotels or motels having more than 500 rooms;

- Industrial, manufacturing, or processing plants or industrial parks planned to house more than 1,000 people, occupy more than 40 acres of land, or have more than 650,000 square feet of floor space;
- Mixed use projects that include one or more of the above types of projects;
- Projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

The City has determined that the Alexan Fashion Valley project does not meet one or more of the above thresholds. Therefore, a Water Supply Assessment is not required for this project.

#### Sewer

• If a project would result in a need for new systems, or require substantial alterations to existing sewer utilities which would create physical impacts.

#### Storm Drains

• If a project would result in a need for new systems, or require substantial alterations to existing storm drain facilities which would create physical impacts.

#### Solid Waste

- Projects that include the construction, demolition, or renovation of 1,000,000 square feet or more of building space may generate approximately 1,500 tons of waste or more and are considered to have direct impacts on solid waste facilities.
- Projects that include the construction, demolition, and/or renovation of 40,000 square feet or more of building space may generate approximately 60 tons of waste or more, and are considered to have cumulative impacts on solid waste facilities.

### <u>Issue 1</u>

Would the proposal result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts with regard to the following utilities: natural gas, water, sewer, communications systems, and solid waste disposal?

Issue 1 addresses the following threshold of significance:

#### Water

• If a project would result in a need for new systems, or require substantial alterations to existing water utilities which would create physical impacts.

#### Sewer

• If a project would result in a need for new systems, or require substantial alterations to existing sewer utilities which would create physical impacts.

#### Storm Drains

• If a project would result in a need for new systems, or require substantial alterations to existing storm drain facilities which would create physical impacts.

#### Solid Waste

- Projects that include the construction, demolition, or renovation of 1,000,000 square feet or more of building space may generate approximately 1,500 tons of waste or more and are considered to have direct impacts on solid waste facilities.
- Projects that include the construction, demolition, and/or renovation of 40,000 square feet or more of building space may generate approximately 60 tons of waste or more, and are considered to have cumulative impacts on solid waste facilities.

Please see Section 5.6, *Energy*, for a discussion of project energy use, including natural gas.

#### Impact Analysis

### WATER/SEWER

The Alexan Fashion Valley project is proposed for a developed site within the Mission Valley community. As such, water facilities have been installed to serve the project and adjacent areas. The size and capacity of these existing utilities would be adequate to serve the proposed Alexan Fashion Valley project. No new systems or alterations to the existing utilities would be required. Impacts to existing water facilities would not occur.

The project proposes a private sewer system that has been designed in general conformance with the City of San Diego Sewer Design Guide. The project would result in a reduction of the projected peak sewer flow-rate due to a change in the uses on the project site. No impacts relative to sewer service would result.

### SOLID WASTE

As described in Section 3.0, *Project Description*, the proposed project is comprised of a mix of residential, commercial office, and retail (restaurant) uses. The resulting estimate of solid waste to be generated by the project is approximately 366 tons per year, as shown in Table 5.14-1, *Estimated Solid Waste Generation from the Alexan Fashion Valley Project – Occupancy Phase.* 

### 5.14-1. Estimated Solid Waste Generation from the Alexan Fashion Valley Project – Occupancy Phase

Use	Intensity	Waste Generation Rate	Estimated Waste Generated (tons/year)	
Residential	284 units	1.2 tons/year/unit	341	
Commercial-Restaurant	8,897 sq ft	0.0028 tons/year/sq ft	25	
		TOTAL	366	

The City's threshold for determining if a project would have a significant direct impact associated with solid waste generation is a project that includes the construction, demolition, or renovation of 1,000,000 square feet or more of building space that may generate approximately 1,500 tons of waste or more per year. The proposed project would not generate more than 1,500 tons of solid waste per year and is under 1,000,000 square feet of building space; therefore, is below the City's threshold of significance for direct impacts on solid waste. Significant direct impacts associated with solid waste would not occur.

The City's threshold for determining if a project would have a significant cumulative impact associated with solid waste generation is a project that includes the construction, demolition, and/or renovation of 40,000 square feet or more of building space that may generate approximately 60 tons of waste or more per year. The project would exceed the City's threshold for cumulative impacts as it would generate more than 60 tons per year of waste with building space in excess of 40,000 square feet and would, therefore, contribute to a significant cumulative impact associated with solid waste.

The project has prepared a WMP, which has been approved by the City's Environmental Services Department. (The approved WMP for the project is included in Appendix J to this EIR.) Implementation of the WMP via permit conditions would ensure that the project would implement waste reduction measures during the construction and occupancy phases of the project. Measures identified in the WMP, when implemented, would ensure that potential impacts to solid waste management facilities, including landfills, materials recovery facilities, and transfer stations, as well as services, including collection, would be below a level of significance.

### COMMUNICATIONS SYSTEMS

The project site is located within an urbanized portion of the City of San Diego currently serviced by a number of communications providers. Facilities are in place to continue communications services in the Mission Valley community. The proposed project would not result in a significant impact to communications systems.
#### Significance of Impacts

The project would not result in significant impacts to water, sewer, solid waste, and communications systems. Additionally, the project would not result in impacts associated with solid waste.

#### **Mitigation Measures**

No significant impacts associated with water, sewer, communications systems, and solid waste would occur. Therefore, no mitigation measures are required.

#### Significance of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

#### <u>Issue 2</u>

Would the proposal result in the use of excessive amounts of water?

#### <u>Issue 3</u>

Does the proposal propose landscaping which is predominantly non-drought resistant vegetation?

Issue 2 and Issue 3 address the following thresholds of significance:

#### Water

- If a project would use excessive amounts of potable water.
- If a project proposes predominantly non-drought resistant landscaping and excessive water usage for irrigation and other purposes.

#### Impact Analysis

The proposed project would develop in accordance with Title 24 of the CCR. Title 24 requires the use of low-water use facilities which reduce water consumption. As such, project water saving features would include:

- Low flow water fixtures
- High efficiency toilets
- High efficiency irrigation systems

As a result of these features, the proposed project would not result in the use of excessive amounts of water. Impacts to water would be less than significant.

Relative to landscaping, the project proposes use of indigenous and drought tolerant plan material. All irrigation design and maintenance would conform to the City of San Diego's latest water use restrictions, and the project's irrigation system has been designed to meet the City's water efficient landscape ordinance. Additionally, irrigation systems would utilize computer-controlled, weatherbased satellite controller/s, linked by digital, phone modem or hardwired method, so that each can be programmed and managed by a computer system operated by the owner's designated landscape maintenance company. A site rain gauge or rain sensor would be connected to the control system.

#### Significance of Impacts

The project would not result in significant impacts to water. No mitigation measures would be required.

#### **Mitigation Measures**

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

#### Significance of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

# 5.15 Health and Safety

The potential for hazardous materials affecting public health and safety within the project site was evaluated in a *Lead-Based Paint Inspection* (Allstate Services; March 20, 2015) and an *Asbestos Survey Report* (Frey Environmental, Inc.; May 1, 2015), contained in Appendix M and N, respectively, of this EIR. The investigations included on-site inspection, sampling, and testing to identify potential environmental concerns. Additionally, Envirofacts and GeoTracker searches were undertaken to determine potential sources of hazardous emissions and/or toxic soils on the project site and in the project area (July, 2016; Appendix O).

# 5.15.1 Existing Conditions

# FEDERAL, STATE, AND REGIONAL REGULATIONS

Numerous Federal, State, and local laws and regulations regarding hazardous materials have been developed with the intent of protecting public health, the environment, surface water, and groundwater resources. Over the years, the laws and regulations have evolved to deal with different aspects of the handling, treatment, storage, and disposal of hazardous substances. Relevant laws and regulations include:

- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, also known as "Superfund," and the Superfund Amendments and Reauthorization Act (SARA) of 1986 (amended CERCLA, SARA Title III). CERCLA, SARA Title III provide a federal framework for setting priorities for cleanup of hazardous substances releases to air, water, and land. This framework provides for the regulation of the cleanup process, cost recovery, response planning, and communication standards.
- Federal Resource Conservation and Recovery Act of 1976. This act established the authority of the U.S. EPA to develop regulations to track and control hazardous substances from their production, through their use, to their disposal.
- The California Division of Occupational Safety and Health Administration (OSHA) and federal OSHA define and enforce worker safety standards and require proper handling and disposal of hazardous materials according to OSHA and EPA and regulations.

These acts establish the authority of the EPA to develop regulations to track and control hazardous substances from their production, through their use, and ultimately to their disposal. These acts also provided a framework for setting priorities for cleanup of hazardous substances and set the precedent for states and local authorities to do the same. Applicable regulatory agencies have kept records on hazardous materials storage, use, and disposal, and make these lists publicly available. Locally, these include the San Diego County Environmental Assessment Listing and the State Department of Toxic Substances Control List.

The San Diego Fire Department screens inventories of substances and inspects sites annually. The County Health Department screens inventories, inspects facilities every 15 months, and reviews Hazardous Materials Business Plans (required for businesses handling hazardous materials), and the SDAPCD evaluates projects for possible toxic emissions and issues permits as necessary.

In regard to worker safety, the federal and state OSHA regulate emissions standards and handling procedures for workers coming into potential contact with hazardous materials. These regulations ensure that safety standards and potential risks, for example to asbestos or lead exposure, are considered and remediated in accordance with the National Emissions Standards for Hazardous Air Pollutants, OSHA, and other applicable State and local regulations.

# ASBESTOS AND LEAD SURVEYS

An asbestos survey was conducted by a Certified Asbestos Consultant (CAC) from FREY Environmental, Inc. (FREY). The purpose of the asbestos survey was to identify potential asbestos containing materials (ACMs) in the site buildings. Because of its fiber strength and heat resistance, asbestos has been used in a variety of building construction materials for insulation and as a fire retardant. Asbestos has also been used in a wide range of manufactured goods, mostly in building materials (roofing shingles, ceiling and floor tiles, paper products, and asbestos cement products), friction products (automobile clutch, brake, and transmission parts), heat-resistant fabrics, packaging, gaskets, and coatings. The use of asbestos sharply declined in the late 1970s when it became evident that asbestos posed a threat to human health and safety. Today, asbestos is a known human carcinogen. Asbestos fibers may be released into the air by the disturbance of asbestos-containing material during product use, demolition work, building or home maintenance, repair, and remodeling. In general, exposure may occur only when the asbestos-containing material is disturbed or damaged in some way to release particles and fibers into the air. Asbestos was found in the existing buildings on the project site to be demolished.

Lead-based paint testing was conducted by Allstate Services in accordance with *Title 17, California Code of Regulations, Division 1, Chapter 8, Accreditation, Certification, and Work Practice in Lead Related Construction, Section 36000* and the United States Department of Housing and Urban Development (HUD) *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Chapter 7 Lead-Based Paint Inspections,* as published in June 1995 and revised in 1997. The purpose of this inspection is to identify surfaces, which contain lead-based paint as per California regulations, the *HUD Guidelines and section 403 of the Toxic Substances Control Act.* The State of California, HUD, and the EPA currently define lead-based paint as a paint or other surface coating which contains lead equal to or greater than 1.0 milligrams of lead per square centimeter of surface area (mg/cm<sup>2</sup>). No Lead-based paint was found at or above the threshold level of 1.0 mg/cm<sup>2</sup>.

# EMERGENCY RESPONSE/EVACUATION

The San Diego Emergency Plan was adopted by the City Council in June 1974 subsequent to the City Council enacting the Emergency Services Ordinance in February of 1974. The plan provides for the effective mobilization of all the resources of San Diego, both public and private, to meet any condition constituting a local emergency and provide for the organization, powers and duties, services, and staff of the emergency organization. The purpose of the plan is to:

- Provide a basis for the conduct and coordination and the management of critical resources during emergencies.
- Establish a mutual understanding of the authority, responsibilities, functions, and operations of civil government in San Diego during an emergency.
- Provide a basis for incorporating emergency organization into those non-governmental agencies and organizations having resources necessary to meet foreseeable emergency requirements.

During peacetime and wartime emergencies, the emergency plan sets forth operational concepts and schedules, and assigns tasks and responsibilities to each of the units of the emergency organization. The plan takes effect if:

- A state of war emergency exists.
- The governor has proclaimed a state of emergency in an area including San Diego.
- The mayor or the director of emergency services orders, provided that the existence or threatened existence of a local emergency has been proclaimed in accordance with the provisions of the Emergency Services Ordinance.

The Office of Emergency Services coordinates the overall county response to disasters and is responsible for alerting and notifying appropriate agencies when disaster strikes, coordinating all agencies that respond, ensuring resources are available and mobilized in times of disaster, developing plans and procedures for response to and recovery from disasters, and developing and providing preparedness materials for the public.

# WILDFIRE RISK

The potential wildfire risk zones are areas that have steep slopes, limited precipitation, and plenty of available vegetation fuel. Currently, the project site is fully developed within the urbanized community of Mission Valley. There are no steep slopes on-site. Existing dense vegetation, which presents the greatest potential for fire risk, in the eastern and southern portions of the project site would be cleared with project construction. Following project implementation, the nearest vegetation fuel would be beyond Camino de la Reina in the San Diego River channel; this vegetation, due to its riparian nature, provides low fuel potential.

# 5.15.2 Impact Analysis

#### Thresholds of Significance

According to the City's Significance Determination Thresholds, impacts associated with hazardous materials/public safety may be significant if:

- The project proposes the handling, storage and treatment of hazardous materials, e.g., a Hazardous Waste Facility, falling under Municipal Code Section 141.1001 Hazardous Waste Research Facilities and Section 141.1002.
- The project site is located on or near known contamination sources.
- The project site meets one or more of the following criteria:
  - Located within 1,000 feet of a known contamination site.
  - Located within 2,000 feet of a known-border zone property (also known as a "Superfund" site) or a hazardous waste property subject to corrective action pursuant to the Health and Safety Code.
  - County Department of Environmental Health (DEH) site file closed. These cases are especially important where excavation (e.g., sewer/water pipeline projects, below grade parking, basements) is involved.
  - Located in Centre City San Diego, Barrio Logan or other areas known or suspected to contain contamination sites.
  - Located on or near an active or former landfill.
  - Located on a site presently or previously used for agricultural purposes.
- The project site has been historically developed with industrial or commercial uses which involved dewatering (the removal of groundwater during excavation), in conjunction with major excavation in an area with high groundwater (such as downtown).
- The project site is located in a designated airport influence area and where the Federal Aviation Administration (FAA) has reached a determination of "hazard" through FAA Form 7460- 1, "Notice of Proposed Construction or Alteration" as required by FAA regulations in the Code of Federal Regulations (CFR) Title 14 §77.13 or the proposed use is inconsistent with an Airport's Land Use Compatibility Plan (ALUCP).

Additionally, impacts associated with public health and safety may be significant if the project would:

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Located in a brush fire hazard area, hillside, or an area with inadequate fire hydrant services or street access.

#### <u>Issue 1</u>

Would the proposal expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Issue 1 addresses the following threshold of significance:

• A project that is located in a brush fire hazard area, hillside, or an area with inadequate fire hydrant services or street access.

#### Impact Analysis

The proposed project is located in an area that would not result in the exposure of people or structures to significant risk due to wildland fire. The project site is located within a fully-developed portion of the City, with multi-lane freeways/highways on two sides and a roadway on two sides. Located within an urban area, there is little fuel available for fire; vegetation along the San Diego River channel does not provide high-risk fuel, due to its generally riparian nature. Impacts due to wildland fire would be less than significant.

#### Significance of Impacts

Impacts due to wildland fire would be less than significant. No mitigation measures are required.

#### **Mitigation Measures**

No mitigation measures are required.

#### Significance of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

#### <u>Issue 2</u>

Would the proposal result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

Issue 2 addresses the following threshold of significance:

• Projects which propose the handling, storage and treatment of hazardous materials, e.g., a Hazardous Waste Facility, falling under Municipal Code Section 141.1001 Hazardous Waste Research Facilities and Section 141.1002.

#### Impact Analysis

There are no existing or proposed schools within a quarter-mile of the project site. Furthermore, the project proposes the construction of a mixed-use development comprised of residential and commercial uses with associated parking (surface and structured). Commercial uses could include offices, restaurant, and other retail space. As such, there would be no hazardous emissions or handling of hazardous materials.

As noted above, asbestos was detected in existing buildings on the project site. These buildings are to be demolished, potentially exposing construction workers and others to asbestos. Building demolition would follow regulatory guidelines and laws in place, as well as state-of-the-industry practices, to protect workers and others involved in construction of the project. Health risks would be minimized to the extent possible. No significant impacts would result

The construction of the project would require the transport, temporary storage, and use of asphalt fuels, paints, and solvents which could potentially be released and result in exposure to these chemicals. The use and handling of materials associated with the construction of the project would follow all applicable federal, state, and local regulations, including California OSHA, Caltrans, and Department of Health, Hazardous Materials Division. The project would comply with all applicable state and local regulations for hazardous materials and waste management during project construction.

#### Significance of Impacts

The proposed project is not within a quarter-mile of an existing or proposed school. Therefore, there is no impact to sensitive receptors at schools. Additionally, industry standards in place would insure no risk to workers by hazardous materials during demolition and construction. Impacts due to hazardous materials would not be significant.

#### **Mitigation Measures**

No mitigation measures are required.

#### Significance of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

#### <u>Issue 3</u>

Would the proposal impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Issue 3 addresses the following threshold of significance:

• Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

#### Impact Analysis

The project would be designed in accordance with applicable safety standards, including the preparation of a site-specific emergency evacuation plan. Proposed buildings would be constructed with fire-resistant construction materials and would include a protective system of sprinklers.

Access to the project site would be from three driveways along Camino de la Reina. An internal fire lane would be constructed per the City Fire Marshal's Standards connecting Driveway 1 and

Driveway 3, running along the entire eastern perimeter of the site. This fire lane would provide adequate site access.

Primary evacuation routes consist of the major interstates, highways, and prime arterials within the City. A San Diego Emergency Plan, including an Evacuation Annex, is in place to provide for the effective mobilization of all the resources of San Diego. The project would not impair implementation of, or physically interfere with, the San Diego Emergency Plan. Additionally, the project is subject to review by the San Diego Fire Department and the San Diego Police Department to ensure compliance with applicable safety standards.

#### Significance of Impacts

The project would be designed in accordance with applicable safety standards. The project would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans. Impacts would be less than significant.

#### **Mitigation Measures**

No mitigation measures are required.

#### Significance of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

#### <u>Issue 4</u>

Would the proposal be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?

Issue 4 addresses the following threshold of significance:

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Located on or near known contamination sources.
- Located within 1,000 feet of a known contamination site.
- Located within 2,000 feet of a known —border zone property (also known as a "Superfund" site) or a hazardous waste property subject to corrective action pursuant to the Health and Safety Code.
- DEH site file closed.
- Located in Centre City San Diego, Barrio Logan, or other areas known or suspected to contain contamination sites.
- Located on or near an active or former landfill.
- A site that has been historically developed with industrial or commercial uses which involved dewatering (the removal of groundwater during excavation), in conjunction with major excavation in an area with high groundwater (such as downtown).

#### Impact Analysis

The Alexan Fashion Valley project site is located in the Mission Valley community and is currently developed with an office building, surface parking, and landscaping. An Envirofacts search was conducted for the project site (Appendix O) and yielded no hazardous materials generators or handlers on the project site. The only permitted hazardous materials generator/handler in the immediate project vicinity is the Union-Tribune, which is a Small Quantity Generator. Any generators/handlers located to the east or south are separated from the project site by multi-lane freeways, acting as a buffer in the event of accidental spills or releases. The GeoTracker search conducted for the project (Appendix O) yielded three closed leaking underground storage tank cases on the Union-Tribune site and one closed clean-up case on the Union-Tribune site. No cases were reported on the project site.

The project site is not listed as a hazardous materials site and, therefore, would not create a significant hazard to the public or environment. The project site is not located within 1,000 feet of a known contamination site. Additionally, the project site is not located within 2,000 feet of a known border zone property (also known as a "Superfund" site) or a hazardous waste property subject to corrective action pursuant to the Health and Safety Code or is subject to a DEH site file that has been closed. The project site is not located in Centre City San Diego, Barrio Logan, or other areas known or suspected to contain contamination sites and is not located on or near an active or former landfill. While the project site has developed with commercial offices uses since 1973, no subterranean structures occur on the project site. Construction for the existing office building did not require dewatering or major excavation, and the project site is not located in an area with high groundwater. Thus, no impacts would result.

#### Significance of Impacts

The project site is not the listed as a hazardous materials site. No mitigation is required.

#### **Mitigation Measures**

No mitigation measures are required.

#### Significance of Impacts Following Implementation of Mitigation Measures

No mitigation measures are required.

#### <u>Issue 5</u>

Would the proposal expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses?

Issue 5 addresses the following threshold of significance:

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Located on or near known contamination sources.

- Located within 1,000 feet of a known contamination site.
- Located within 2,000 feet of a known —border zone property (also known as a "Superfund" site) or a hazardous waste property subject to corrective action pursuant to the Health and Safety Code.
- DEH site file closed.
- Located in Centre City San Diego, Barrio Logan, or other areas known or suspected to contain contamination sites.
- Located on or near an active or former landfill.
- A site that has been historically developed with industrial or commercial uses which involved dewatering (the removal of groundwater during excavation), in conjunction with major excavation in an area with high groundwater (such as downtown).
- Located on a site presently or previously used for agricultural purposes

#### Impact Analysis

The proposed project is not the site of previous agriculture uses. Therefore, no risk of exposure to toxic substances such as pesticides and herbicides would result.

#### Significance of Impacts

The proposed project is not the site of previous agriculture uses. Therefore, no risk of exposure to toxic substances such as pesticides and herbicides would result.

#### **Mitigation Measures**

No risk of exposure to toxic substances such as pesticides and herbicides would result. No mitigation measures are required.

#### Significance of Impacts Following Implementation of Mitigation Measures

No risk of exposure to toxic substances such as pesticides and herbicides would result. No mitigation measures are required.

#### <u>Issue 6</u>

Would the proposal result in a safety hazard for people residing or working in a designated airport influence area?

#### <u>Issue 7</u>

Would the proposal result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or helicopter facility that is not covered by an adopted Airport Land Use Compatibility Plan?

Issue 6 and Issue 7 address the following threshold of significance:

- Project sites that meet one or more of the following criteria may result in a significant impact.
- Projects located in a designated airport influence area and where the Federal Aviation Administration (FAA) has reached a determination of "hazard" through FAA Form 7460- 1, "Notice of Proposed Construction or Alteration" as required by FAA regulations in the Code of Federal Regulations (CFR) Title 14 §77.13 or inconsistent with an Airport's Land Use Compatibility Plan (ALUCP) could be a significant impact.

#### Impact Analysis

The project site is not located within two miles of a private airstrip or private airport or helicopter facility not covered by an adopted ALUCP. The project site is located within AIAs of San Diego international Airport and Montgomery Field Airport. The AIA is "the area in which current or future airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses." To facilitate implementation and reduce unnecessary referrals of projects to the ALUC, the AIA is divided into Review Area 1 and Review Area 2. The project site is located within Review Area 2 of both AIAs (Figure 2-8., *Montgomery Field ALUCP Airport Influence Area* and Figure 2-9., *San Diego International Airport Influence Area* in Section 2.0, *Environmental Setting*). The composition of each area is determined as follows:

- Review Area 1 consists of locations where noise and/or safety concerns may necessitate limitations on the types of land uses. Specifically, Review Area 1 encompasses locations exposed to noise levels of community noise level equivalent (CNEL) 60 decibels (dB) or greater together with all of the safety zones depicted on the associated maps in this chapter. Within Review Area 1, certain types of land use actions, including rezones and plan amendments, are to be submitted to the ALUC for review and consistency determination with the ALUCP.
- Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and/or overflight areas depicted on the associated maps in the MCAS Miramar ALUCP. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. The additional function of this area is to define where various mechanisms to alert prospective property owners about the nearby airport are appropriate. Within Review Area 2, only land use actions for which the height of objects is an issue are subject to ALUC review.

The ALUCP contains four principal compatibility concerns: noise (exposure to aircraft noise), safety (land use factors that affect safety both for people on the ground and occupants of aircraft), airspace protection (protection of airport airspace), and overflight (annoyance or other general concerns related to aircraft overflights). The project site is located within the Overflight Notification Area, as shown in Figure 5.15-1, *San Diego International Airport Compatibility Policy Map: Overflight*. An

Overflight Notification is a buyer awareness tool that ensures prospective buyers of residential land use development near an airport are informed about the airport's potential impact on the property. The project does not propose for-sale residential land uses; therefore, this notification area is not applicable. As shown in Figure 5.15-2, *San Diego International Airport Airspace Protection Boundary*, the project site is located within the Airspace Protection Boundary for the San Diego International Airport, but outside of the FAA Part 77 certification of non-obstruction area. The project site is located outside of the noise contours and safety zones for San Diego International Airport. No impacts would result.

The project site is located within the FAA Height Notification Boundary of Montgomery Field Airport, as shown in Figure 5.15-3, Montgomery Field Airport Compatibility Policy Map: Part 77 Airspace Protection. The Part 77 Height Notification Boundary extends 20,000 feet from the nearest point of any runway. 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. No impacts would result.

#### Significance of Impacts

Although the project site is within the AIAs of San Diego International Airport and Montgomery Field Airport, the proposed project would not result in impacts associated with the four compatibility concern areas. As a result, there are no impacts to any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.

#### **Mitigation Measures**

No impacts relative to airport compatibility would result. No mitigation measures are required.

#### Significance of Impacts Following Implementation of Mitigation Measures

No impacts relative to airport compatibility would result. No mitigation measures are required.



Figure 5.15-1. San Diego International Airport Compatibility Policy Map: Overflight



Figure 5.15-2. San Diego International Airport Airspace Protection Boundary



Figure 5.15-3. Montgomery Field Airport Compatibility Policy Map: Part 77 Airspace Protection

# 5.16 Tribal Cultural Resources

# 5.16.1 Existing Conditions

Assembly Bill 52 (Gatto 2014), more commonly known as AB 52, was signed into law July 1, 2015. AB 52 created a new category of environmental resources that must be considered under CEQA: "tribal cultural resources." The legislation imposes new requirements for consultation regarding projects that may affect a tribal cultural resource, includes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures. AB 52 requires that lead agencies throughout the State of California undertaking CEQA review, at the request of a California Native American tribe, begin "government-to-government" consultation with that tribal national prior to the release of a Negative Declaration, Mitigated Negative Declaration or Environmental Impact Report for a project. Key to this process is that a tribal nation shall inform the City in writing and provide an accompanying map of potential locations for tribal cultural resources.

AB 52 adds tribal cultural resources to the categories of cultural resources in CEQA, which had formerly been limited to historic, archaeological, and paleontological resources. Under AB 52, lead agencies must now evaluate a project's potential impact to a "Tribal Cultural Resource" (TCR), keeping in mind that TCRs may not always be visible.

TCRs are either of the following:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
  - (a) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
  - (b) Included in a local register of historical resources as defined in subdivision (k) of Public Resources Code Section 5020.1.
- (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

- (a) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- (b) A historical resource described in Public Resources Code Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Public Resources Code Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Public Resources Code Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

Under AB 52, a project that may cause a substantial adverse change in the significance of a tribal cultural resource is defined as a project that may have a significant effect on the environment. Where a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact.

Recognizing that tribes may have expertise with regard to their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. If the tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. Consultation may include discussing the type of environmental review necessary, the significance of tribal cultural resources, the significance of the project's impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe. The parties must consult in good faith, and consultation is deemed concluded when either the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource (if such a significant effect exists) or when a party concludes that mutual agreement cannot be reached.

Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document. AB 52 also identifies mitigation measures that may be considered to avoid significant impacts if there is no agreement on appropriate mitigation. Recommended measures include:

- preservation in place
- protecting the cultural character and integrity of the resource
- protecting the traditional use of the resource
- protecting the confidentiality of the resource
- permanent conservation easements with culturally appropriate management criteria.

# 5.16.2 Impact Analysis

#### Thresholds of Significance

The City of San Diego has not yet prepared Thresholds of Significance for potential impacts to tribal cultural resources. Therefore, for purposes of this EIR, guidance provided by issue questions listed in CEQA Appendix G are used to evaluate the potential for significant impacts to tribal cultural resources.

#### <u>Issue 1</u>

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

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

#### Impact Analysis

The City of San Diego Development Services Department began consultation with a California Native Tribe on February 21, 2017. The California Native Tribe responded on February 27, 2017 and concurred with the City's conclusions ending the consultation.

As stated in Section 5.10, *Historical Resources*, of this EIR, 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 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.

Based upon the developed nature of the project site, it does not appear that a tribal cultural resource is present on site; however, it is not clearly known if there could be a buried archaeological site beneath the ground surface that could be eligible for listing on the California Register. Therefore, there is the potential for ground-disturbing activities to result in impacts to unknown tribal cultural resources (archaeology), which would be regarded as a potentially significant impact. Any such site would be considered to be of cultural value to California Native Tribes. Pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, a lead agency, in its discretion and supported by substantial evidence, shall consider the significance of the resource to a California Native American tribe by applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1.

# Impact 5.16-1:The proposed project could result in direct impacts to unknown<br/>subsurface tribal cultural resources (archaeological), as a result of<br/>excavation and trenching for the project.

No significant resources pursuant to subdivision (c) of Public Resources Code Section 5024.1 have been identified on the project site. However, due to the potential for subsurface cultural resources to be present at the project site, mitigation measure MM 5.10-1 presented in Section 5.10, Historical Resources, including the requirement for a Native American monitor, would be required to reduce all impacts in this category to below a level of significance.

#### Significance of Impacts

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, including human remains, that may not be visible on the surface. Any such site would be considered to be of cultural value to California Native tribes. 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 tribal cultural resources could occur as a result of the Alexan Fashion Valley project development. Therefore, implementation of **MM 5.10-1** presented in Section 5.10 is required to reduce impacts to below a level of significance.

#### Significance of Impacts following Implementation of Mitigation Measures

Implementation of MM 5.10-1 would mitigate potential direct impacts to tribal cultural resources below a level of significance.

# 6.0 CUMULATIVE EFFECTS

Section 15355 of the State CEQA Guidelines describes *"cumulative impacts"* as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. These individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from a project is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

The discussion of cumulative impacts for the Alexan Fashion Valley project considers both existing and future projects in the Alexan Fashion Valley project vicinity. For this analysis, the project vicinity is defined as the west-central Mission Valley community. Existing and future projects are based on the following information sources:

- A summary of projections contained in the City's General Plan and the Mission Valley Community Plan; and
- Past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the City of San Diego. These projects include those which result in or contribute to regional or area-wide conditions.

According to Section 15130 of the CEQA Guidelines, the discussion of cumulative effects "...need not be provided as great a detail as is provided the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness." The evaluation of cumulative impacts is required by Section 15130 to be based on either: "(A) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) a summary of projections contained in an adopted general plan or related planning document, on in a prior environmental document which had been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative effect. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency."

The basis and geographic area for the analysis of cumulative impacts is dependent on the nature of the issue and the project. For analysis of cumulative impacts which are localized (e.g., traffic and public services), a list of past, approved, and pending projects was identified. The location of these projects is illustrated in Figure 6-1, *General Location of Cumulative Projects*.

Provided below is a description of the planning documents used in this analysis of cumulative effects, as well as the development projects which have been individually evaluated for their contribution to cumulative effects.

# 6.1 Plans Considered for Cumulative Effects Analysis

# 6.1.1 General Plan

The proposed project is located within the City of San Diego. The City of San Diego's General Plan sets forth a comprehensive, long-term plan for development within the City of San Diego. As such, the plan and development guidelines it identifies pertain to the project site. The current General Plan was adopted in March 2008 and represents a comprehensive update and replacement of the City's 1979 *Progress Guide and General Plan*. The City's General Plan includes incorporation of a Strategic Framework Element, which replaces the previous chapter entitled "Guidelines for Future Development."

San Diego comprises 219,241 acres (approximately 342 square miles), and less than four percent of this land remains vacant and developable. The City expects to reach an estimated population of 1,542,324 by the year 2020 and 1,690,232 by the end of 2030. Future development will require the City to reinvest in existing communities to plan for greater urbanization of infill sites. The City of San Diego General Plan identifies the project site as Commercial Employment, Retail, and Services.

# 6.1.2 Mission Valley Community Plan

The project site is located within the Mission Valley Community Plan area. The Mission Valley Community Plan is located within the central area of the City of San Diego, between the I-805 and I-15 freeways. The San Diego City Council first adopted the Mission Valley Community Plan on June 25, 1985. It was subsequently amended numerous times between 1985 and 2005.

The Mission Valley 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. The expected population in the year 2035 is 34,145, based on SANDAG's population forecast for the Mission Valley community. The project site is identified for Commercial-Office uses in the Mission Valley Community Plan. The project proposes a mix of residential and commercial uses and complies with the Mission Valley Community Plan's Multiple Use Development option.

# 6.2 **Projects Considered for Cumulative Effects Analysis**

As stated above, the past, present, and probable future projects considered in this cumulative analysis would produce related or cumulative impacts when evaluated in relation to the potential impacts of the project. Table 6-1, *Alexan Fashion Valley Cumulative Projects List*, includes a list of projects considered in the analysis of cumulative effects. Descriptions of development projects that have been individually evaluated for their contribution to cumulative effects are provided below.

Reference No.	Project Name	Location	Description	Environmental Document	Status
1	Homewood Suites (PTS No. 322356)	2201 Hotel Circle South	Site Development Permit to demolish an existing hotel and construct a 216-guestroom, five- story hotel on a 4.44-acre lot that contains Environmentally Sensitive Lands (Steep Hillsides). The project site is zoned MV-CO-CV (Mission Valley Planned District Ordinance – Commercial Office and Visitor Commercial).	MND	Under construction
2	Union Tribune Mixed Use (PTS No. 277550)	350 Camino De La Reina	Site Development Permit and Vesting Tentative Map to construct 198 residential condominium units, 234,415 square feet office space, and 6,470 square feet of retail space on a 12.86-acre site (the site of the existing Union Tribune newspaper building). This site is zoned MV-I (Mission Valley Planned District – Industrial).	EIR	Approved
3	Legacy International Center (PTS No. 332401)	875 Hotel Circle South	Proposed amendment to the Mission Valley Community Plan, an amendment to the Atlas Specific Plan, a Planned Development Permit, a Site Development Permit, Conditional Use Permits, and a Vesting Tentative Map. Located on an approximate 18-acre site, this project would demolish the existing Mission Valley Resort Hotel and construct a mixed-use project involving religious, lodging, administrative, recreational, and commercial retail uses. The Legacy	EIR	In process.

Table 6-1. Alexan Fashion Valley Cum	ulative Projects List
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Reference No.	Project Name	Location	Description	Environmental Document	Status
			International Center site is zoned MV-M/SP (Multiple Use/Specific Plan) by the Mission Valley Planned District Ordinance.		
4	Residence Inn SDP (PTS No. 322365)	445 Camino Del Rio South	Site Development Permit to demolish an existing restaurant (formerly the location of El Torito) and construct a 118-guestroom, five-story hotel with underground parking. The project site is approximately 1.41 acres in size. The site is zoned MV-CO-CV in the Mission Valley Planned District Ordinance.	It was determined that this project is exempt under CEQA.	Approved
5	Quarry Falls (Civita)	North side of Friars Road, between Mission Center Road and I-805	The Quarry Falls project (now called Civita) is a mixed-use development currently under construction. When complete, the master planned development would include public parks, civic uses, open space and trails; a maximum of 4,780 residential units; a maximum of 603,000 square feet of retail space; and a maximum of 620,000 square feet of office/business park uses.	PEIR	Under Construction
6	Hazard Center Drive Extension	Mission Center Road to Fashion Valley	Hazard Center Drive is to be extended to connect to Fashion Valley from Mission Center Road. This connection is expected to provide another route parallel to Friars Road for traffic traveling in the east-west direction.	A project feature in the Hazard Center EIR Project No. 146803	Approved

	1			1	1
7	Hazard Center Drive	7510 Hazard Center	Site Development Permit, Planned	EIR	Approved
	Redevelopment Project	Drive, 1370 Frazee Road,	Development Permit, Community		
	No. 146803	and 7676 Hazard Center	Plan Amendment, Specific Plan		
		Drive	Amendment, and Vesting		
			Tentative Map to demolish a		
			portion of an existing commercial		
			space and construct up to 473		
			residential units (including up to		
			48 affordable units) and		
			approximately 4,205 square feet		
			of commercial retail/restaurant		
			space on a 14.52-acre site located		
			on Hazard Center Drive at Frazee		
			Road. The Hazard Center		
			Redevelopment Project site is		
			zoned OF-1-1 (Open Space—		
			Floodplain) Zone and MV-M/SP.		
8	Camino del Rio Mixed	730 Camino del Rio	Mission Valley Development	EIR	Approved
	Use		Permit in the form of a Site		
			Development Permit and a		
			Planned Development Permit. The		
			project proposes a mix of 291		
			residential units, 14 shopkeeper		
			units, 5,000 feet of small office		
			space, and 4,000 square feet of		
			retail space.		
9	Town and Country Hotel	500 Hotel Circle North	An application to replace 254 hotel	EIR	In process.
	Redevelopment		rooms and		
			35,625 square feet of convention		
			space with 840 residences.		
10	Lankford Medical Office	1904 Hotel Circle North	92,400 Medical office space	Project is being	In process.
				amended	
11	Discovery Place	2401 Camino Del Rio	A mix of 111 room hotel, 1,500	Exempt	Completed.
		North	square feet of fast food		
			restaurant, and 6,000 square feet		
			of commercial/retail uses		

12	USD Master Plan (Project. No. 417090)	5998 Alcala Park	Addition of 3,000 full-time equivalent people to the USD	Supplemental EIR	In process.
			campus		

# 6.3 Cumulative Effects Analysis

# 6.3.1 Cumulative Impacts Found to Be Significant

The project would result in cumulatively significant impacts in the area of: Transportation / Traffic Circulation / Parking.

# TRANSPORTATION/TRAFFIC CIRCULATION/PARKING

As discussed in Section 5.2, *Transportation/Traffic Circulation/Parking*, the proposed project would result in cumulative impacts related to traffic circulation when considered in concert with other proposed or approved projects in the project area. The TIA prepared for the project considers other proposed or approved projects that are expected to have impacts within the study area. These "other projects" are added to existing traffic counts (for cumulative year 2035) in order to determine cumulative impacts. For purposes of evaluating cumulative traffic impacts, the following other projects were considered in the analysis of cumulative transportation and traffic circulation impacts:

- Union Tribune Mixed Use Estimated to generate 1,128 ADT.
- Camino del Rio Mixed Use Estimated to generate 2,165 ADT.
- Riverwalk (Phase I) Estimated to generate 26,330 ADT.
- Legacy International Center Estimated to generate 277ADT.
- Town and Country Estimated to generate 210 ADT.

In the evaluation of cumulative transportation/circulation impacts, the Cumulative (year 2035) analysis functions as the cumulative analysis for the project, because the project is consistent with the Mission Valley Community Plan. When considered with the other cumulative projects, two significant cumulative impacts to the street segments of Camino de la Reina from Hotel Circle North to Driveway 1 and Camino de la Reina from Driveway 2 to Avenida del Rio would result, as presented in Section 5.2. The project would not result in any cumulative impacts at project area intersections. As presented in Section 5.2 of this EIR, mitigation measures would be required to mitigate the project's contributions to cumulatively significant transportation/circulation impacts to below a level of significance.

# 6.3.2 Cumulative Impacts Found Not to Be Significant

Based on the analyses contained in Section 5.0 and Section 7.0 of this EIR, the project's contribution to land use, visual quality/neighborhood character, air quality, greenhouse gas emissions, energy, noise, geologic conditions, paleontological resources, historical resources, hydrology, water quality, public services and facilities, public utilities, tribal cultural resources, and health and safety impacts would not be cumulatively considerable, as analyzed below.

# LAND USE

As discussed in Section 5.1, *Land Use*, development on the project site is governed by the City's General Plan, 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 Montgomery Field ALUCP, San Diego International Airport ALUCP, and the San Diego River Park Master Plan, and is within the City's MSCP area. For a detailed discussion and analysis of all these plans, refer to Section 5.1, *Land Use*.

The project would be consistent with all applicable goals, policies, and objectives of the General Plan. As presented in Section 5.7, *Noise*, the project would result in interior noise levels in excess of the City's Noise Compatibility Guidelines requirements. However, project design features, including windows with STC ratings higher than those provided by standard building construction and air conditioning, would be implemented as part of the project. Additionally, interior noise levels would be attenuated in accordance with Title 24, bringing the project into conformance with the General Plan's Noise Compatibility Guidelines. The project would be consistent with the Mission Valley Community Plan's objectives, proposals, and development guidelines. The proposed project would also be consistent with the regulations of the Mission Valley PDO and with the pertinent regulations of the respective ALUCPs. Additionally, the project would be consistent with the applicable regulations of the San Diego River Park Master Plan.

Other projects considered in this cumulative effects analysis would be evaluated to determine conformance with the City's General Plan, Mission Valley Community Plan, Mission Valley PDO (as applicable), and the City's Land Development Code and would be required to comply with those policy documents and applicable ordinances, as well as the ALUCPs and San Diego River Park Master Plan, as applicable. Projects that are not consistent with the General Plan/Community Plan land use designation(s) or existing zoning would require processing of a Plan Amendment and/or zone change. Projects needing a General Plan/Community Plan Amendment are required to demonstrate conformance with pertinent goals, policies, and recommendations.

As demonstrated, the project, when considered with other planned development in the Mission Valley Community Plan area and with the cumulative projects outlined in Section 6.2, *Projects Considered for Cumulative Effects Analysis*, would not result in any significant cumulative impacts due to inconsistency or conflict with an adopted land use plan, land use designation, or policy.

# VISUAL EFFECTS/NEIGHBORHOOD CHARACTER

As discussed in Section 5.3, *Visual Quality/Neighborhood Character*, the proposed project would alter the visual appearance of the project site by increasing building density and changing the land uses, overall style, and landscaping of the site. The proposed project is consistent with the City of San Diego General Plan, Mission Valley Community Plan, the City's Land Development Code, MSCP Subarea Plan, and San Diego River Park Master Plan. The proposed project would not result in a substantial adverse effect on any visual resources and would not create substantial light, glare or shading in the area, or significantly alter identified viewsheds. The proposed project would result in less than significant impacts to visual resources and neighborhood character.

When considered in conjunction with cumulative projects, as well as buildout of the Mission Valley Community Plan, changes to the visual environment and neighborhood character would occur. The Union Tribune (UT) project located across Camino de la Reina from the proposed Alexan Fashion Valley project would be the most apparent development in the project neighborhood that would contribute to the cumulative change in the visual environment and neighborhood character. The proposed project has been designed in a manner that considers and reflects the approved UT project. The project's massing, colors, and materials have been selected to complement and blend with the brick of the adjacent Union Tribune building.

Like the proposed project and the approved UT project, other projects that would occur in west Mission Valley would be required to consider scenic resources and viewshed character, and would be required to comply with the City Outdoor Lighting Regulations to avoid glare and nighttime lighting impacts. Therefore, cumulative impacts to visual quality and neighborhood character are not anticipated and the proposed project would not contribute to cumulatively significant impacts to visual quality/neighborhood character.

# AIR QUALITY

As discussed in Section 5.4, *Air Quality*, the SDAB is considered a nonattainment area for the 8-hour NAAQS for O<sub>3</sub>, and is considered a nonattainment area for the CAAQS for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. An evaluation of emissions of nonattainment pollutants was conducted and it was determined that emissions of all nonattainment pollutants would be below the screening-level thresholds.

The area surrounding the Alexan Fashion Valley project is already developed; the project provides infill development. Because the project is consistent with the RAQS, SIP, the General Plan, and the Mission Valley Community Plan, it would not result in a cumulatively considerable increase emissions of ozone precursors (NOx and VOCs).

Other projects within the air basin would generate emissions that could exceed thresholds, contributing to poor air quality. Ministerial projects would be considered consistent with the RAQS, SIP, the General Plan, and the Community Plan in which they are located and would not result in a cumulatively considerable increase emissions of ozone precursors (NOx and VOCs). Projects requiring a discretionary permit would be reviewed under CEQA and, as applicable, would be required to prepare an air quality analysis evaluating consistency with the RAQS and SIP and identifying if significant air quality impacts could result. If there is a potential for impacts, mitigation measures would be required to reduce cumulatively significant air quality impacts to below a level of significance.

Emissions from construction activities associated with the project would not be significant. However, It is likely that other projects within the Mission Valley community could develop at the same time as the proposed project. Each project would require the incorporation of standard dust control measures to control fugitive particulate emissions, which would ensure that cumulative impacts would not result. Cumulative impacts associated with air quality would be less than significant.

# GLOBAL CLIMATE CHANGE

As discussed in Section 5.5, Global Climate Change, the proposed project has been found to be consistent with the CAP Consistency Checklist. By nature, greenhouse gas and global climate change evaluations are a cumulative study, which takes into account the entirety of the immediately surrounding area. 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. Cumulative impacts would therefore be less than significant.

# ENERGY

As discussed in Section 5.6, *Energy*, the project proposes a change in use from what has been developed on the site; however, the project would not result in a substantial increase in energy consumption or significant cumulative impacts associated with energy use. The project would not use power in excess of that anticipated for the proposed uses. No adverse effects on non-renewable resources are anticipated. The project would follow UBC and Title 24 requirements for energy efficiency in effect at the time of construction that would reduce the project's overall demand for energy. As such, the project would operate more efficiently than existing development constructed on the project site and would not result in a cumulatively considerable contribution on energy demand.

Other projects developed within Mission Valley would be required to follow current or future UBC and Title 24 requirements for energy efficiency that are applicable at the time individual projects come forward. Therefore, a cumulatively considerable impact on energy supplies would not result.

# NOISE

As discussed in Section 5.7, *Noise*, the proposed project would not generate significant noise levels affecting ambient off-site noise levels. Furthermore, the project would not generate noise that, when added to noise generated by other projects considered as part of this cumulative effects evaluation, would be regarded as cumulatively significant.

Because future exterior transportation noise levels would exceed 60 dBA CNEL, dwelling units fronting SR-163 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 would result in a less than significant interior noise impact with project features incorporated. No cumulative impacts would occur.

Other cumulative projects considered as part of this cumulative effects analysis could also result in conflicts with the General Plan's Noise Compatibility Guidelines. However, measures would be required on a project level to ensure that interior noise levels are brought into conformance with the General Plan. Therefore, cumulative noise impacts associated with land use would not occur.

# GEOLOGIC CONDITIONS

As discussed in Section 5.8, *Geologic Conditions*, the proposed Alexan Fashion Valley project would follow standard construction practices to ensure no geologic impacts would result from project development. Project design and adherence to UBC requirements include features intended to reduce the potentially adverse effects of earthquake ground shaking and soil liquefaction to an acceptable level of risk in accordance with current standards. The proposed project would not result in cumulatively considerable impacts related to geologic hazards or soils.

Other cumulative projects constructed within Mission Valley would be required to conduct sitespecific geologic studies to evaluate underlying soils and geologic units and to determine stability. Those projects, like the proposed project, would follow standard construction practices to ensure no geologic impacts would result from development. No cumulative impacts relative to geologic conditions would result.

# PALEONTOLOGICAL CONDITIONS

As discussed in Section 5.9, *Paleontological Resources*, the proposed project would not result in impacts to paleontological resources and would not contribute to cumulatively significant impacts associated with paleontological resources. The Alexan Fashion Valley project does not have the potential to impact paleontological resources; excavation quantities would not exceed the City's thresholds, and grading would not occur within geologic formations known to exhibit paleontological resources.

# HISTORICAL RESOURCES

As discussed in Section 5.10, *Historical Resources*, no historical structures are located on the project site. Existing structures on the property were constructed in 1973 and are less than 45 years old.

Thus, a Potential Historic Resources Review of the property was not required. While no significant archeological resources have been identified on the project site, project development involves grading that may have the potential to unearth previous unknown subsurface archaeological resources in an area of the City that has been identified as sensitive with regard to prehistoric resources. As a result, the project has the potential for significant impacts to occur to unknown resources encountered during excavation activities. Mitigation measures would be implemented in the event important resources or human remains are encountered.

Projects which could occur within Mission Valley could have a similar potential to adversely affect unknown subsurface resources, which could result in a cumulatively significant impact to archaeological resources. Similar to the proposed project, other projects would be required to conduct a survey of sensitive areas and implement appropriate mitigation measures, in accordance with CEQA and City regulations. In this manner, if cumulatively considerable impacts were to occur, those would be mitigated to below a level of significance.

# HYDROLOGY

As discussed in Section 5.11, *Hydrology*, the project would not extract water from an aquifer, increase runoff, or increase flooding. In addition, the proposed project would not substantially impact drainage patterns or impact downstream water bodies as a result of altered drainage patterns. The project would control drainage and runoff in accordance with City requirements. The project would be consistent with the City of San Diego Drainage Design Manual and would implement BMPs in accordance with local and state requirements. Therefore, the project would not contribute to cumulatively significant impact associated with hydrology.

Other cumulative projects would be required to utilize state-of-the-art BMPs to ensure proper drainage, runoff control, and improved water quality and adhere to state and local requirements. Additionally, many of the projects proposed for Mission Valley are redevelopment projects. Like the proposed project, these redevelopments would likely increase pervious surfaces and would adopt BMPs not currently present on the exiting developed sites. No cumulative impacts to hydrology would occur.

# WATER QUALITY

As discussed in Section 5.12, *Water Quality*, development of the Alexan Fashion Valley project would implement BMPs to minimize the impacts of construction and post-construction activities on the quality and quantity of storm water to the maximum extent possible. With implementation of BMPs, the proposed project would avoid significant impacts to water quality and would not contribute to a cumulatively significant impact to water quality. Additionally, the proposed project would remove uses currently on-site that may negatively contribute to water quality due to the release of oils and other contaminants through runoff. No cumulative impacts to water quality would result.

Other cumulative projects that have the potential to create storm water runoff which would drain to the San Diego River would be required to utilize state-of-the-art BMPs to ensure proper drainage and runoff control similar to the proposed project. Additionally, many of the projects proposed for Mission Valley are redevelopment projects. Like the proposed project, these redevelopments would likely increase pervious surfaces and would adopted BMPs not currently present on redevelopment sites. No cumulative impacts to hydrology would occur.

# PUBLIC SERVICES AND FACILITIES

As discussed in Section 5.13, *Public Services and Facilities*, public services and facilities include population-based uses, including schools, libraries, and parks, as well as police and fire protection. No cumulatively significant impacts to public services and facilities would occur. The project is located within an area of Mission Valley that is developed and contains the necessary Police and Fire-Rescue infrastructure. Relative to parks, the proposed project would be required to pay DIF, a portion of which would go to developing and maintaining parks within Mission Valley. The proposed project would not result in a significant impact to these services' ability to serve the community.

Relative to schools, public school service within the project area is provided by SDUSD. Correspondence with SDUSD indicates that, although the proposed project would not have an adverse impact upon District schools, in combination with on-going development at Civita, approved development of the Union Tribune and Camino del Rio mixed-use projects, and the Town and Country Master Plan project, the cumulative potential increase in students could impact District schools to the point of reaching capacity and requiring additional planning for sufficient facilities. Senate Bill 50 (SB50), also known as the "Class Size Reduction Bill," was enacted in 1998. While SB50 authorizes the collection of developer fees for school facilities construction, it also establishes a maximum cap on such fees (and indexes for inflation). Developer fees collected pursuant to SB50 are "deemed to be full and complete mitigation" (California Government Code Section 65995 et seq.). SB50 also prohibits local agencies from denying land use approvals on the basis of inadequate school facilities, so long as the project proposed pays the developer fees if required to do so. (CGC, Section 65995 et seq.) The project would be required to pay school fees in compliance with CGC Section 65995 et seq., as would future projects developing in Mission Valley and within the District as a while. With payment of the school facilities fee, cumulative impacts would be less than significant as stipulated by California Government Code Section 65996.

Future cumulative projects that could result in developments within Mission Valley would be evaluated to ensure adequate Police and Fire-Rescue services are available at the time individual projects come forward. Additionally, future projects would be required to mitigate any significant impacts to population-based resources, such as schools, libraries, and parks. These requirements would ensure that no cumulative impacts to public services and facilities would occur.

# PUBLIC UTILITIES

As discussed in Section 5.14, *Public Utilities*, public utilities include water, sewer, storm water drainage, and solid waste disposal on a community-wide basis. Relative to public utilities such as water and sewer, the project would be served by existing utilities and does not have potential to contribute to cumulative effects associated with these public utilities. Other projects would also analyze their effects on public utilities such as water and sewer and provide mitigation as necessary. No cumulative impacts would occur.

The Alexan Fashion Valley project would generate solid waste through construction and operation of the proposed mixed-use development. In accordance with ESD guidelines pertaining to new developments that are expected to generate large amounts of solid waste, a Waste Management Plan was required for the Alexan Fashion Valley project, as well as other development projects in San Diego. The plan addresses solid waste management techniques for demolition, construction, and operational activities, including reuse and recycling of materials. To reduce the amount of waste generated by demolition activity, the demolished materials would be sorted at the project site and recycled in accordance with the demolition debris recycling strategies given by the City of San Diego Environmental Services Department. Additionally, the City's Municipal Code requires that new multi-unit residential and commercial/industrial developments provide adequate space for storage and collection of refuse and recyclable materials. The proposed project, as well as other development projects, would be required to comply with this requirement. Cumulative impacts associated with solid waste disposal would be avoided by adherence to City requirements.

Other projects would also be required to demonstrate compliance with City policies relative to solid waste management and disposal. No cumulative impacts would occur.

# HEALTH AND SAFETY

As discussed in Section 5.15, *Health and Safety*, asbestos was detected in existing buildings on the project site. These buildings are to be demolished, potentially exposing construction workers and others to asbestos. Building demolition would follow regulatory guidelines and laws in place, as well as state-of-the-industry practices, to protect workers and others involved in construction of the project. Health risks would be minimized to the extent possible. No significant impacts would result.

The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Additionally, the proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The

proposed project is not located within the vicinity of a private airstrip, or within two miles of a public airport, or public use airport, and would therefore not result in a safety hazard for people residing or working in the project area. The proposed project is located within the Montgomery Field Airport and San Diego international Airport AIAs, but would no conflict with either document. The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Other projects would also be required to demonstrate compliance with City policies relative to health and safety, as well as with applicable ALUCPs. Other projects would analyze health and safety effects on the project relative to emergency response and wildland fire and would be required to implement measures to ensure that significant health and safety impacts do not occur. No cumulatively significant impacts are anticipated.

# TRIBAL CULTURAL RESOURCES

As discussed in Section 5.16, Tribal Cultural Resources, it does not appear that any tribal cultural resources are present on the project site. However, project development involves grading that may have the potential to unearth previous unknown subsurface archaeological resources that could be eligible for listing on the California Register. Any such site would be considered to be of cultural value to California Native tribes. As a result, the project has the potential for significant impacts to occur to unknown tribal cultural resources encountered during excavation activities. Mitigation measures would be implemented in the event important resources are encountered.

Projects which could occur within Mission Valley could have a similar potential to adversely affect unknown subsurface resources, which could result in a cumulatively significant impact to archaeological resources. Similar to the proposed project, other projects would be required to conduct a survey of sensitive areas and implement appropriate mitigation measures, in accordance with CEQA and City regulations. In this manner, if cumulatively considerable impacts were to occur, those would be mitigated to below a level of significance.


Figure 6-1. General Location of Cumulative Projects

# 7.0 EFFECTS NOT FOUND TO BE SIGNIFICANT

Section 15128 of the State CEQA Guidelines requires an EIR to contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. Pursuant to Section 15128 of the CEQA Guidelines, the following issue areas were determined not to have the potential to cause adverse effects, and therefore have not been addressed in detail in the EIR.

### 7.1 Agricultural Resources and Forestry

The City of San Diego uses an Initial Study Checklist to provide guidance and determine potential significance on agricultural resources by a proposed project. Based on the City's Initial Study Checklist, a proposal could result in significant agricultural impacts if it would result in:

- Conversion of a substantial amount of Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- Conflict with existing zoning for agricultural use, or Williamson Act contract.
- Involve other changes in the existing environment which due to their location or nature, could result in conversion of Farmland to non-agricultural use.

The proposed project site is currently the location of an approved development consisting of office buildings, parking lots, and associated improvements. The site does not contain land that is designated as prime agricultural soils by the Soils Conservation Service, nor does it contain prime farmlands designated by the California Department of Conservation. The site is not subject to, nor is it near, a Williamson Act contract site pursuant to Sections 51200-51207 of the California Government Code. The project site and surrounding area are designated as urban and built up land. There is no farmland located in proximity to the project site. Therefore, impacts associated with agricultural resources were not found to be significant.

# 7.2 Biological Resources

The analysis presented is in response to each initial study checklist question and demonstrates why the project's effects on biological resources are not found to be significant. Based on the City's Initial Study Checklist, a proposal could result in significant biological impacts if it would result in:

• A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS);

- A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG or USFWS;
- A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;
- Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites;
- A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, either within the MSCP plan area or in the surrounding region;
- Introducing land use within an area adjacent to the MHPA that would result in adverse edge effects;
- A conflict with any local policies or ordinances protecting biological resources; or
- An introduction of invasive species of plants into a natural open space area.

There are no biological resources on the project site, as the project site has been completely developed, and the project site does not have the potential for sensitive resources to occur. The project site is not part of a migratory path and does not provide habitat for sensitive species. As such, the proposed project would not have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. The project would likewise not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. The project site does not contain wetlands; therefore, the project would not have a substantial adverse effect on Federally-protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means. The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species of with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The proposed project would not conflict with any local policies or ordinances protecting biological resources. The project does not conflict with the San Diego River Park Master Plan. The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, Multiple Species Conservation Plan or another approved local, regional, or State habitat conservation plan. The project site is not located within an MSCP area or an area adjacent to the MHPA that would result in edge effects. The project would not introduce invasive species of plants as the landscape plan includes the use of indigenous and/or drought tolerant material. No invasive or potentially invasive species would be utilized.

### 7.3 Growth Inducement

The analysis presented is in response to each initial study checklist question and demonstrates why the project's effects on growth inducement are not found to be significant. Based on the City's Initial Study Checklist, a proposal could result in significant growth inducement impacts if it would:

- Induce substantial population growth in an area, (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the community plan).
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area.
- Include extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvements Project list, when such infrastructure exceeds the needs of the project and could accommodate future developments.

The project is an infill redevelopment project providing a mix of uses located within an area with an existing circulation network and infrastructure in place to serve the development. Due to the infill redevelopment nature of the project, the project would not foster population growth, either directly or indirectly, as it would accommodate the population currently existing, rather than opening up a new area of land for population growth. The project may foster economic growth for the City by providing commercial uses. However, this economic growth would not trigger population growth, as the new economic opportunities would serve the existing built out Mission Valley community and surrounding urban communities.

The project would alter the project site to allow for development of the Alexan Fashion Valley project. The development of the proposed project would not, however, result in growth inducement. The project site is a previously developed site located in the midst of fully developed community in the City of San Diego. The proposed project would not substantially alter the planned location, distribution, density, or growth rate of Mission Valley, adjacent communities, or the City as a whole.

The project would not include extensions of roads or other infrastructure not assumed in the Community Plan or adopted Capital Improvements Project List. No new infrastructure would be provided that would exceed the needs of the project and/or could accommodate future growth not already planned for the project area.

### 7.4 Mineral Resources

The analysis presented is in response to each initial study checklist question and demonstrates why the project's effects on mineral resources are not found to be significant. Based on the City's Initial Study Checklist, a proposal could result in significant mineral resources if it would result in:

 The loss of availability of a significant mineral resource (e.g. sand or gravel) as identified the Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production – Consumption Region, 1996, Department of Conservation, California Department of Geological Survey.

The project site is the location of an approved urban development. The site is not designated as a mineral resource area. The proposed project would not result in the loss of availability of any mineral resources that would be of value to the region. Therefore, there would be no significant impact on mineral resources with the implementation of the proposed project.

### 7.5 Population and Housing

The project proposes housing that would result in an increase in population. However, as stated in Section 7.3, *Growth Inducement*, the project would not induce substantial population growth in the surrounding area, as the project is an in-fill, redevelopment project. Additionally, since the project does not propose the extension of new roads or other infrastructure, it does not have the potential to indirectly increase population or housing. Furthermore, the project does not displace substantial numbers of existing housing, which could necessitate the construction of replacement housing elsewhere. Therefore, the project does not have the potential to result in significant adverse environmental effects associated with population and housing.

### 7.6 Recreation

The City considers parkland deficiencies a planning and facilities issue and not an environmental impact issue. In addition, the City's CEQA Significance Determination Thresholds indicate parks and recreational services needs are based on population. 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 parkland to serve the project's anticipated population. The project would meet its population-based park requirements through the payment of Development Impact Fees.

Additionally, 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. The project would not result in a physical impact associated with construction of public facilities beyond those included as a part of the project and addressed in this environmental impact report.

The proposed project would meet the City's population-based parks requirement and would provide additional on-site park amenities to serve the project's residents. Therefore, effects associated with recreation were found not to be significant.

# 8.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

As required by Section 15126.2(c) of the CEQA Guidelines, the significant irreversible environmental changes of a project shall be identified. Irreversible commitments of non-renewable resources are evaluated to assure that their use is justified. Irreversible environmental changes typically fall into three categories: primary impacts, such as the use of nonrenewable resources; secondary impacts, such as highway improvements which provide access to previously inaccessible areas; and environmental accidents associated with a project.

Development would occur as a result of the project that would entail the commitment of energy and natural resources. The primary energy source would be fossil fuels, representing an irreversible commitment of this resource. Construction of the project would also require the use of various raw materials, including cement, concrete, lumber, steel, etc. These resources would also be irreversibly committed.

Once constructed, use of the Alexan Fashion Valley project would entail a further commitment of energy resources in the form of fossil fuels and electricity. This commitment would be a long-term obligation since the proposed structures are likely to have a useful life of 20 to 30 years or more. However, the project's energy consumption would be commensurate with its types of uses and would not be excessive. The impact of increased energy usage is not considered a significant adverse environmental impact.

# 9.0 ALTERNATIVES

In accordance with Section 15126.6(a) of the CEQA Guidelines, an EIR must contain a discussion of "*a* range of reasonable alternatives to the project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Section 15126.6(f) further states that "the range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." Thus, the following discussion focuses on project alternatives that are capable of eliminating significant environmental impacts or substantially reducing them as compared to the proposed project, even if the alternative would impede the attainment of some project objectives, or would be more costly. In accordance with Section 15126.6(f)(1) of the State CEQA Guidelines, among the factors that may be taken into account when addressing the feasibility of alternatives are: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

As required in CEQA Guidelines Section 15126.6(a), in developing the alternatives to be addressed in this section, consideration was given regarding an alternative's ability to meet most of the basic objectives of the project. These objectives are presented in Section 3.0, *Project Description*, of this EIR and are re-printed below for reference:

- 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 trips, thereby reducing the amount of routine daily trips.

• Provide for a mix and type of residential units currently unavailable in the community.

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

In accordance with Section 15126.6(c) of the State CEQA Guidelines, the following analysis of project alternatives is preceded by a brief description of the rationale for selecting the alternatives to be discussed. In addition, alternatives that were considered and rejected are also identified.

### 9.1 Alternatives Considered But Rejected

### 9.1.1 Alternative Location Alternative

Mission Valley is essentially a 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 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.

In accordance with CEQA Guidelines Section 15126.6(f)(2)(A), alternative locations for the project would be considered if "any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." If the project were developed on an alternative site in the community or other areas of the City or County, significant environmental impacts could result that would not occur with the proposed development of the project site. There are no native habitats or known wildlife resources located on the project site or in adjacent areas. Thus, impacts to biological resources would be avoided with the proposed project. The site has easy access to public streets and freeways and is already served by existing public

facilities, services, and utilities. A similar level of intensity as the proposed project constructed at another site could potentially have increased levels of impacts relative to air quality, traffic, and GHG emissions, as another site may not have the same or similar developed characteristics, walkability, and multi-modal transportation opportunities. Other sites may contain significant sensitive resources, and development on another site could result in significant impacts, which would not occur at the proposed project site.

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.

### 9.1.2 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 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 129,300 square feet of multi-tenant office. Parking would be provided in surface lots and/or a parking structure in accordance with City parking requirements for multi-tenant office use. The design of the office building(s) would be with appropriate architectural detail and in keeping with the styles, bulk, and scale of other office developments in west-central Mission Valley. Like the proposed project, this alternative would be elevated out of the 100-year floodplain. Additionally, for purposes of the environmental analysis, it is assumed that the All Commercial Development alternative would include sustainable design features required by Title 24 and the CAP Consistency Checklist.

Like the project, the All Commercial Development 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 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.

As shown in Table 9-1, *All Commercial Development Alternative Trip Generation*, 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.

This alternative would meet some of the project objectives. However, 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.

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lleo	Intoncity	Pata	407	AM Peak Hour					PM Peak Hour								
use intensity	Kule	ADI	Peak %	Vol.	In%:Out%	In	Out	Peak %	Vol.	In%:Out%	In	Out					
All Commercial Alternative																	
Multi-Tenant Office	129,300 SF	Formula <sup>1</sup>	2,050	13%	267	90%:10%	240	27	14%	287	20%:80%	57	230				
SL	JBTOTAL		2,050		267		240	27		287		57					
Existing Land Uses																	
Multi-Tenant Office	69,700 SF	Formula <sup>1</sup>	1,284	13%	167	90%:10%	150	17	14%	180	20%:80%	36	144				
NET TOTAL (Alternative-Existing) 766 100 90 10							107		21	86							
Source:	Source:																
Trip Rates taken from C	ity of San Diego Ti	rip Generation	manual, M	/lay 2003													
Transit and mixed-use r	eductions are tak	en from the Ci	ty of San E	Diego Traffic I	mpact Si	tudy Manual, Ju	uly 1998.										
Note:																	
ADT = Average Daily Tri	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)																	
<i>Ln(Trips)</i> =0.756*L	N (Commercial Of	fice KSF) + 3.95	5					Ln(Trips) =0.756*LN (Commercial Office KSF) + 3.95									

#### Table 9-1. All Commercial Alternative Trip Generation

Because the All Commercial Development alternative does not meet most of the project's objective and does not substantially reduce impacts, it was rejected from further analysis.

### 9.1.3 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.

The PDO Multiple Use Zone Consistency alterative would include physically and functionally integrated commercial office, commercial retail, and multi-family residential uses. 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. 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.

When compared to the proposed project, as shown in Table 9-2, *PDO Multiple Use Zone Consistency Alternative Trip Generation*, this alternative would result in an increase of 1,626 new ADT, nearly doubling the new trips associated with the proposed project. This alternative would reduce outbound AM peak hour trips, but would result in an increase in all other peak hour trips. Thus, this alternative would result in greater traffic impacts than the proposed project. Relative to other environmental issues areas determined to be potentially significant in this EIR [i.e., geologic conditions (potential direct impact to liquefaction, historical resources (unknown subsurface archaeological resources), and tribal cultural resources (unknown subsurface archaeological resources)], impacts would be the same as the proposed project, as those impacts are associated with any redevelopment of the project site.

				AM Peak Hour					PM Peak Hour						
Use	Intensity	Rate	ADT	Peak	Vol.	In%:Out%	In	Out	Peak	Vol.	In%:Out%	In	Out		
				%					%						
			PDO M	ultiple Us	e Zone Co	onsistency Alt	ernative								
Multiple Dwelling Units	408 units	6/unit	408	8%	33	20%:80%	7	26	9%	37	70%:30%	26	11		
Multi-Tenant Office	61,500 SF	Formula <sup>1</sup>	1,169	13%	152	90%:10%	137	15	14%	164	20%:80%	33	131		
Quality Restaurant	10,250 SF	130/KSF	1,333	1%	107	60%:40%	54	54	8%	107	60%:40%	64	43		
SUBTO	OTAL		2,910		292		198	198		308		123	185		
	Existing Land Uses														
Multi-Tenant Office	69,700 SF	Formula <sup>1</sup>	1,284	13%	167	90%:10%	150	17	14%	180	20%:80%	36	144		
NET TOTAL (Alter	native-Existin	g)	1,626		7		-65	96		84		113	-29		
Source:															
Trip Rates taken from City of	San Diego Trip	Generation m	anual, Ma	ay 2003											
Transit and mixed-use reduc	tions are taker	from the City	of San Die	ego Traffio	: Impact S	tudy Manual, Ju	ıly 1998.								
Note:															
ADT = Average Daily Trips															
KSF = 1,000 square feet															
1= Commercial Office ADT ca	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 (Commercial Office KSF) + 3.95															
2 = The quality restaurant m	2 = The quality restaurant mixed-use reduction equals the sum of the total mixed-use reductions for residential and commercial office.														

Table 9-2. PDO Multiple Use Zone Consistency Trip Generation

This alternative could meet some of the project objectives, such as enhancing this portion of the Mission Valley community by creating a "Main Street" feel along Camino de la Reina, with buildings that address the street; creating a focal point/pedestrian plaza that functions as a space for social gathering; utilizing architecture and design elements to ensure high quality design and aesthetics; creating additional retail and job opportunities in the Mission Valley community; and providing retail amenities for the adjacent employment and residential uses that are not only within walking distance but also capture drive-by trips, thereby reducing the amount of routine daily trips. However, this alternative does not substantially reduce any environmental impacts and would significantly increase traffic impacts. This alternative would also not meet the primarily objectives of the project relative to maximizing efficient use of the project site and one that provides a transit oriented, pedestrian focused development which locates residential uses in proximity to transit in a manner that implements the City of Villages and Smart Growth principles, as well as the goals of the Climate Action Plan. Therefore, the PDO Multiple Use Zone Consistency alternative was rejected from further analysis.

### 9.1.4 Alternative 3 – Alternative Land Uses Alternative

The project proposes a mix of land uses, including residential, commercial office, and retail commercial.\_Based on the analysis contained in Section 5.0 of this EIR, the proposed project would result in the potential for significant impacts to transportation/traffic circulation/parking (cumulative street segment impacts), historical resources (unknown subsurface archaeological resources), and tribal cultural resources (unknown subsurface archaeological resources). Any re-development of the project site could result in impacts to unknown subsurface archaeological resources. Mitigation measures have been identified which would reduce all impacts to below a level of significance.

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 nonresidential 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. As shown in Table 9-3. *Residential with Commercial Office Uses Alternative Trip Generation*, 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 development the project site with 284 residential units and approximately 11,295 square feet of commercial office uses was rejected from further analysis.

				AM Peak Hour					PM Peak Hour				
Use	Intensity	Rate	ADT	Peak	Vol.	In%:Out	In	Out	Peak	Vol.	In%:Out	In	Out
				%		%			%		%		
Residential with Commercial Office Uses Alternative													
Multiple Dwelling Units	284 units	6/unit	1,70 4	8%	136	20%:80%	27	109	9%	153	70%:30%	107	46
Multi-Tenant Office	11,295 SF	Formula <sup>1</sup>	325	13%	42	90%:10%	38	4	14%	46	20%:80%	9	37
SUBTOTAL			2,02 9		178		65	113		199		116	83
Existing Land Uses													
Multi-Tenant Office	69,700 SF	Formula <sup>1</sup>	1,28	13%	167	90%:10%	150	17	14%	180	20%:80%	36	144
			4										
NET TOTAL (Alter	rnative-Existi	ng)	745		11		-85	96		19		80	-61
Source: Trip Rates taken from City	Source: Trip Pates taken from City of Can Diago Trip Conception manual May 2002												
Transit and mixed use reducts a steep from the City of San Diego Traffic Impact Study Manual July 1998													
Note:													
ADT = Average Daily Trips													
KSF = 1,000 square feet													

Table 9-3. Residential with Commercial Office Uses Alternative Trip Generation

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 (Commercial Office KSF) + 3.95

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. As shown in Table 9-4. *Residential with Retail Commercial Uses Alternative Trip Generation*, 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 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 development the project site with 284 residential units and approximately 11,000 square feet of retail commercial uses was rejected from further analysis.

		AM Peak Hour					PM Peak Hour						
Use	Intensity	Rate	ADT	Peak	Vol.	In%:Out%	In	Out	Peak	Vol.	In%:Out%	In	Out
				%					%				
Residential with Retail Commercial Uses Alternative													
Multiple Dwelling Units	284 units	6/unit	1,704	8%	136	20%:80%	27	109	9%	153	70%:30%	107	46
Specialty Retail	11,295 SF	40/KSF	425	3%	14	60%:40%	8	6	9%	41	50%:50%	21	21
Center/Strip Commercial													
SUBTO	OTAL		2,156		150		35	115		194		128	67
Existing Land Uses													
Multi-Tenant Office	69,700 SF	Formula <sup>1</sup>	1,284	13%	167	90%:10%	150	17	14%	180	20%:80%	36	144
NET TOTAL (Alter	native-Existin	g)	872		-17		-115	98		14		92	-77
Source:													
Trip Rates taken from City of	San Diego Trip	Generation m	anual, Ma	ay 2003									
Transit and mixed-use reduc	tions are taker	from the City	of San Die	ego Traffic	Impact S	tudy Manual, Ju	uly 1998.						
Note:													
ADT = Average Daily Trips													
KSF = 1,000 square feet	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 (Commercial Office KSF) + 3.95													

### Table 9-4. Residential with Retail Commercial Uses Alternative Trip Generation

## 9.2 Alternatives Considered

Alternatives to the Alexan Fashion Valley project are considered and discussed in this section. These include the "No Project" alternative that is mandated by CEQA and an alternative that was 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

Relative to the requirement to address a "No Project" alternative, CEQA Guidelines Section 15126.6(e) states that:

When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future.

If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed.

For the Alexan Fashion Valley project, the No Project/No Build alternative would result in no redevelopment of the project site. In other words, if the project does not go forward, the existing development as described in Section 2.4, *Existing Site Conditions*, of this EIR would remain.

### 9.3 Alternatives Analysis

The impacts of each alternative are analyzed in this section of the EIR. The review of alternatives includes an evaluation to determine if any specific environmental characteristic would have an effect that is *"substantially less"* than the proposed project. A significant effect is defined in Section 15382 of

the CEQA Guidelines as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project." As presented in Section 5.0, Environmental Analysis, this EIR has determined that the proposed project could result in potentially significant direct impacts associated with Archaeological Resources and cumulative impacts associated with Traffic Circulation.

### 9.3.1 Alternative 1 – No Project/No Build

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a "no project" alternative along with its impacts. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it. Specifically, Section 15126.6(e)(3)(B) requires that an EIR for a development project on an identifiable property address the no project alternative as "circumstances under which the project does not proceed." In other words, the no project assumes that the project site would not be developed with the project.

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.

#### Environmental Analysis

Land Use. As presented in Section 5.1, Land Use, 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 I-8/SR-163 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. 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 design features and consistency with the City's CAP. 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. Finally, the project would comply with all applicable recommendations of the San Diego River Park Master Plan.

Under the No Project/No Build alternative, the existing uses on-site would remain. Significant environmental effects associated with land use would not occur under the No Project/No Build alternative, as the existing development is consistent with the General Plan, Community Plan, and

SDMC; and no deviations would be required under this alternative. Due to the configuration of the existing building, this alternative does not locate the majority of the building's glass area on the south elevation, as recommended by the solar access development guideline within the Community Plan's Design Element. The No Project/No Build alternative would avoid the need for noise attenuation design features that are associated with the proposed project.

**Transportation/Traffic Circulation/Parking.** As presented in Section 5.2, *Transportation/Traffic Circulation/Parking*, the proposed project would generate 874 new ADT, with 20 additional AM peak hour trips and 21 additional PM peak hour trips. The proposed project 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. Measures would be required that mitigate cumulative traffic impacts to below a level of significance.

The No Project/No Build alternative would not result in new impacts associated with traffic circulation. All street segments and intersections function at acceptable levels with the existing conditions, with the exception of Camino de la Reina from Driveway 3 to Camino de la Siesta, which functions at LOS E. This alternative would contribute traffic to this already congested roadway segment. Sufficient parking is provided for the current uses; therefore, like the proposed project, this alternative would also not result in parking impacts or parking congestion in the community. No new traffic improvements would occur under this alternative.

**Visual Effects/Neighborhood Character.** As concluded in Section 5.3, *Visual Effects and Neighborhood Character*, the project's impact on the visual character and quality of the surrounding environment is considered less than significant. The proposed project would not result in a substantial degradation of the existing visual character or quality of the site or its surroundings. The project would not result in bulk, scale, materials, or style that are incompatible with surrounding development; and the proposed project would not result in significant lighting and glare impacts.

Under the No Project/No Build alternative, the existing development would remain as it does today. The current development on-site consists of 69,651 square feet of office buildings and on-site surface parking. Landscaping includes turf, mature trees, and non-native ornamental vegetation. Chain link fencing occurs along the eastern and southern perimeters of the site. The existing development is consistent with the existing character of the community. However, with approval and implementation of the Union Tribune mixed-use project, the character of the area is transitioning from standard office buildings to a modern mix of mid-rise residential and commercial/office elements. As the Union Tribune project is developed, the existing uses on the project site will become less visually compatible with the community and may appear out of scale. The proposed project would result an improvement in visual quality and neighborhood compatibility when considered in context with the approved development for the Union Tribune. **Air Quality.** The proposed project is consistent with applicable air quality control plans, including the RAQS, the SIP, and SANDAG's Transportation Control Measures. 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. Construction impacts would be temporary and for a short duration. Therefore, air quality impacts associated with project operations and construction would not be significant.

The No Project/No Build alternative would not result in any changes to the existing site conditions. No development, construction, or grading would occur under the No Project/No Build alternative. Therefore, the No Project/No Build alternative would not have the potential to cause any increase in air emissions that would result during construction and operation of the proposed project. Although such impacts would not be significant under the proposed project, the No Project/No Build alternative would result in fewer environmental effects associated with air quality because less vehicular emissions would be generated under this alternative and no new construction would occur.

**Global Climate Change.** The proposed 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 associated with GHG emissions would therefore be less than significant with the proposed project.

The No Project/No Build alternative would not generate GHG emissions as a result of construction, because no new construction would occur. The No Project/No Build alternative would contribute to global climate change through the generation of greenhouse gas emissions associated with operations and vehicle trips. Less GHG emissions would be generated by the No Project/No build alternative than the proposed project due to less traffic associated with this alternative. Therefore, impacts associated with greenhouse gas emissions would be less under this alternative than those associated with the proposed project. However, neither the proposed project nor this alternative would result in significant impacts associated with greenhouse gas emissions.

**Energy.** The proposed 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 be consistent with the CAP by incorporating sustainable design features directed at reducing energy consumption.

Under the No Project/No Build alternative, energy consumption would remain as it is today. Existing development on the project site was constructed prior to energy conserving measures that are currently available. As such, modern energy conserving measures have not been implemented to the extent that would be required for and augmented by the proposed project. However, development on the project site is relatively low in intensity and energy use. Similar to the proposed

project, impacts relative to energy would not be significant under the No Project/No Build alternative.

**Noise.** The proposed project would not result in significant operational or construction noise impacts. The proposed project would locate dwelling units fronting I-8/SR-163 and Camino de la Reina that would be exposed to exterior noise levels exceeding the General Plan standard of 65 dBA CNEL (Community Noise Equivalent Level in A-weighted decibels). Project design features would be implemented to comply with the California Building Code, Title 24 requirements for interior noise in habitable rooms, which would reduce noise levels to comply with City requirements for interior noise levels.

Under the No Project/No Build alternative, no noise impacts would result. Existing uses are compatible with the surrounding noise environment, and existing uses would not generate noise levels that exceed City standards. Because no new construction or grading would occur with the No Project/No Build alternative, noise associated with these activities would be avoided, although such impacts would not be significant under the proposed project. Although neither this alternative nor the proposed project would result in significant noise impacts, noise impacts associated with this alternative would be considered less than what would occur with the proposed project due to no need for demolition and construction.

**Geologic Conditions.** The proposed project would be required to adhere to the California Building Code and appropriate state-of-the-art seismic design parameters of the Structural Engineers Association of California, which would minimize to the extent possible seismic risks associated with developing at the project site. Additionally, the proposed project would not result in a substantial increase in wind or water erosion of soils, either on or off the site. Therefore, no significant environmental impacts associated with geologic conditions would occur.

The No Project/No Build alternative would not result in any changes to the existing site conditions. Currently, the project site is developed with existing structures and on-site surface parking. Impacts associated with geologic conditions would not change from what occurs today. The presence of several discontinuous and variable thickness liquefiable layers of saturated alluvial materials are considered susceptible to liquefaction at the design earthquake ground motion. Impacts related to liquefaction, seismic settlement, and lateral spreading would be minimized by adherence to City building regulations and through implementation of a ground improvement program that includes the use of stone columns under settlement sensitive structure; no significant impacts would result. However, the No Project/No Build alternative would not be required to implement design features that would avoid the potential for soil liquefaction. In this manner, the No Project/No Build alternative would not provide the level of protection from seismic risk as the proposed project.

**Paleontological Resources.** The proposed project does not have the potential to impact paleontological resources; excavation quantities would not exceed the City's thresholds, and grading

would not occur within geologic formations known to exhibit paleontological resources. No mitigation would be required.

Because no development, construction, or grading would occur under the No Project/No Build alternative, this alternative also does not have the potential to encounter subsurface paleontological resources. Therefore, the No Project/No Build alternative would not result in impacts associated with paleontological resources.

**Historical Resources.** 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. Although no historical resources were identified within the boundaries of the project site, recorded sites have been identified within proximity to the project site. Due to the sensitivity of the area, potentially significant impacts to unknown subsurface archeological resources could result during ground-disturbing activities. In order to mitigate potential impacts to unknown subsurface archaeological resources, archaeological monitoring would be required in areas of the project site not impacted by the construction of the existing building, such as the landscaped areas and parking lots surrounding the existing building.

The No Project/No Build Alternative does not have the potential to impact cultural resources, as no new development would occur. Therefore, when compared to the project, this alternative would result in no impacts and would not require mitigation measures.

**Hydrology.** While the proposed project would result in an increase in impervious surfaces from what exists today, it would result in an overall decrease in peak runoff and would not result in significant impacts to drainage patterns. The proposed project would also not result in flood hazards to the project site or impose flood hazards on other properties, because the project development would elevate the project site out of the 100-year floodplain. No significant impacts associated with the site's hydrology are anticipated.

The No Project/No Build alternative would not result in any changes to the existing site conditions. Currently, the project site is developed with existing structures and on-site surface parking. Impacts to hydrology would not change from the current state. The No Project/No Build alternative has not been constructed to elevate the site out of the floodplain. Therefore, greater impacts associated with hydrology would occur under this alternative, when compared to the project.

**Water Quality.** Property modifications associated with the proposed project are not expected to substantially affect the quality of storm water runoff leaving the site compared to existing conditions, because the project would implement BMPs to minimize the impacts of post-construction activities on the quality and quantity of storm water to the maximum extent practicable. In addition, BMPs would be implemented to control the construction sources of

potential storm water pollutants. The proposed project would result in less runoff than what currently exists and would eliminate expanses of open parking areas that generate pollutants, therefore improving site conditions. Implementation of the proposed BMPs would preclude significant potential impacts to water quality.

The No Project/No Build alternative would not result in any changes to the existing site conditions. Currently, the project site is developed with existing structures and on-site surface parking, and onsite uses have the potential to generate a greater degree of pollutants due to the less extensive landscaping and bioswale system that currently exists on-site when compared to what is proposed with the project. The No Project/No Build alternative would not implement current BMPs and LIDs required to ensure that pollutant-laden runoff does not exit the site. Therefore, impacts to water quality could be considered greater than the proposed project.

**Pubic Services and Facilities.** The project site is currently developed with existing structures and on-site surface parking. Existing development is served by public service facilities, such as fire/life safety protection and police projection. The proposed project would not result in significant impacts to police protection, fire/life safety protection, libraries, parks or other recreation facilities, and schools.

The No Project/No Development alternative would have a similar demand on public services for police protection and fire and safety as the project. This alternative would not generate school-aged children and would not create a resident population that would use school, library, or recreational services. Because no new development would occur under the No Project/No Build alternative that could result in an increase in population, impacts on public services and facilities would be less under the No Project/No Build alternative. However, the proposed project would likewise not result in significant impacts to public services and facilities.

**Public Utilities.** The project would not result in significant impacts to water, sewer, solid waste, and communications systems. The No Project/No Build alternative would not result in any changes to the existing site conditions. Currently, the project site is developed with existing structures and onsite surface parking. Like the proposed project, public utilities are provided to serve the existing uses; and the existing development does not result in significant impacts to water, sewer, storm water drainage, and solid waste. Therefore, the No Project/No Build alternative and the proposed project would be considered to have the same level of non-impact associated with public utilities.

**Health and Safety.** The project would be designed in accordance with applicable safety standards and would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans. The project site is not listed as a hazardous materials site. Industry standards in place would insure no risk to workers by hazardous materials during demolition and construction. Although the project site is within the AIAs of San Diego International Airport and Montgomery Field Airport, the proposed project would not result in impacts associated with the respective ALUCPs. As a result, the project would not result in impacts associated with health and safety.

The No Project/No Build alternative would not result in any changes to the existing site conditions. Current uses on-site are consistent with the ALUCPs for San Diego International Airport and Montgomery Field. Additionally, there are no current health risks relative to surrounding hazardous materials handlers. Like the proposed project, this alternative would not result in any significant impacts relative to health and safety. Therefore, the No Project/No Build alternative would result in the same level of non-impact to health and safety as the proposed project.

**Tribal Cultural Resources.** Although no tribal cultural resources were identified within the boundaries of the project site, recorded sites have been identified within proximity to the project site. Due to the sensitivity of the area, potentially significant impacts to unknown subsurface archeological resources could result during ground-disturbing activities. In order to mitigate potential impacts to unknown subsurface archaeological resources, archaeological monitoring would be required in areas of the project site not impacted by the construction of the existing building, such as the landscaped areas and parking lots surrounding the existing building.

The No Project/No Build Alternative does not have the potential to impact cultural resources, as no new development would occur. Therefore, when compared to the project, this alternative would result in no impacts and would not require mitigation measures.

**Cumulative Effects.** As presented in Section 6.0, *Cumulative Effects*, of this EIR, the project would result in cumulative impacts which, when considered together with other past, present, and reasonably future projects, are considerable or which compound or increase other environmental impacts to Traffic Circulation. Under the No Project/No Build alternative, the project site would remain as it is developed today, with office buildings and surface parking. This alternative would not result in any new significant impacts. This alternative would not result in significant contributions to cumulative environmental impacts. However, street segments along Camino De La Reina would continue to operate at an unacceptable level of service with no mitigation.

#### **Evaluation of Alternative**

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 not meet any of the project objectives.

### 9.3.2 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), tribal cultural resources (archeological) cannot be reduced and/or avoided with any redevelopment of the project site and are therefore are 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 SDMC 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 alterative 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.

#### **Environmental Analysis**

Land Use. As presented in Section 5.1, Land Use, 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 I-8/SR-163 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. 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 design features and consistency with the City's CAP. 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. Finally, the project would comply with all applicable recommendations of the San Diego River Park Master Plan.

The Reduced Density alternative would also be designed to be consistent with the General Plan and Community Plan policies applicable to the project site, similar to the proposed project. However, due to the greatly reduced residential density, this alternative would not realize the General Plan's City of Villages strategy and other goals and policies relative to compact, smart growth developments than the proposed project, as fewer residents would be provided the opportunity to live in an inclusive infill development integrated into the existing active transportation, transit, and urban fabrics. Fewer residents would be afforded a lifestyle where they can authentically live, work, and play without ever needing a personal automobile. Additionally, this alternative would not forward the goals of the General Plan Economic Prosperity Element relative to small business and live-work opportunities, as those units and amenities would not be provided.

Like the proposed project, if deviations are required for this alternative, it is assumed that those are required due to the site's physical configuration and would result in a superior development than what would be provided without the deviations. Relative to secondary land use impacts, the Reduced Density alternative would require the same level of noise attenuation as the proposed project. Thus, with regards to secondary land use effects, this alternative would result in similar impacts relative to noise levels. **Transportation/Traffic Circulation/Parking.** As presented in Section 5.2, *Transportation/Traffic Circulation/Parking*, the proposed project would generate 874 new ADT, with 20 additional AM peak hour trips and 21 additional PM peak hour trips. The proposed project 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. Measures would be required that mitigate cumulative traffic impacts to below a level of significance.

As shown in Table 9-5, *Reduced Density Alternative Trip Generation* the Reduced Density alternative would generate less traffic than the proposed project. ADT would be less with this alternative and would eliminate the significant cumulative impacts on Camino de la Reina. Therefore, this alternative would result in less traffic impacts when compared to the proposed project.

lleo	Pata	407	AM Peak Hour					PM Peak Hour					
036	intensity	Kule	AUT	Peak %	Vol.	In%:Out%	In	Out	Peak %	Vol.	In%:Out%	In	Out
	Reduced Density Alternative												
Multiple Dwelling Units	121 units	6/unit	726	8%	58	20%:80%	12	46	9%	65	70%:30%	46	20
Multi-Tenant Office	8,480 SF	Formula <sup>1</sup>	261	13%	34	90%:10%	31	3	14%	37	20%:80%	7	30
Quality Restaurant	3,275 SF	100/KSF	426	8%	34	50%:50%	17	17	8%	34	60%:40%	20	14
SUB	TOTAL		1,413		126		60	66		136		73	64
Existing Land Uses													
Multi-Tenant Office	69,700 SF	Formula <sup>1</sup>	1,284	13%	167	90%:10%	150	17	14%	180	20%:80%	36	144
NET TOTAL (Alte	ernative-Exist	ing)	129		-41		-90	49		-44		37	-80
Source: Trip Rates taken from City Transit and mixed-use rev Note: ADT = Average Daily Trips KSF = 1,000 square feet 1 = Commercial Office AD <i>Ln(Trips)</i> =0.756*LN	NET TOTAL (Alternative-Existing)    129    -41    -90    49    -44    37    -80      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    Star Diego Trip Generation Manual, May 2003 (see below)    Image: Commercial Office KSE) + 3.95												

#### Table 9-5. Reduced Density Alternative Trip Generation

**Visual Effects/Neighborhood Character.** As concluded in Section 5.3, *Visual Effects/Neighborhood Character*, the project's impact on the visual character and quality of the surrounding environment is considered less than significant. The proposed project would not result in a substantial degradation of the existing visual character or quality of the site or its surroundings. The project would not result in bulk, scale, materials, or style that are incompatible with surrounding development; and the proposed project would not result in significant lighting and glare impacts.

The Reduced Density alternative would develop a mixed-use building similar to the proposed project. This alternative would reduce the amount of common outdoor amenity space provided to residents, 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. Like the proposed project, general building design would be in keeping with the architectural style of the surrounding development. However, because parking requirements would be reduced, the size of the parking structure could also be reduced with more surface parking. Similar to the project, this alternative

would be designed in a manner that would be compatible with the neighborhood character. Significant impacts to visual quality and neighborhood character would not be expected. Therefore, both this alternative and the proposed project would result in less than significant impacts to visual effects and neighborhood character.

**Air Quality.** The proposed project is consistent with applicable air quality control plans, including the RAQS, the SIP, and SANDAG's Transportation Control Measures. 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. Construction impacts would be temporary and for a short duration. Therefore, air quality impacts associated with project operations and construction would not be significant.

The Reduced Density alternative would result in less impacts to air quality when compared to the project, because less traffic generation would occur. This alternative would be consistent with applicable plans. When compared to the proposed project, the Reduced Density alternative results in less air quality impacts.

**Global Climate Change.** 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 associated with GHG emissions would therefore be less than significant with the proposed project.

The Reduced Density alternative would result in less impacts associated with global climate change than the project, because this alternative would result in less traffic generation. When compared with the proposed project, the Reduced Density alternative would result in less impacts associated with greenhouse gas emissions.

**Energy.** The proposed 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 be consistent with the CAP by incorporating sustainable design features directed at reducing energy consumption.

The Reduced Density alternative would develop with a similar level of sustainable design features as the proposed project. The Reduced Density alternative's impact on energy would be considered similar to the project.

**Noise.** The proposed project would not result in significant operational or construction noise impacts. The proposed project would locate dwelling units fronting I-8/SR-163 and Camino De La Reina that would be exposed to exterior noise levels exceeding the General Plan standard of 65 dBA

CNEL (Community Noise Equivalent Level in A-weighted decibels). Project design features would be implemented to comply with the California Building Code, Title 24 requirements for interior noise in habitable rooms, which would reduce noise levels to comply with City requirements for interior noise levels.

The Reduced Density alternative would require the same level of noise attenuation as the proposed project, since it includes residential uses although at a lower unit count. The Reduced Density alternative's impact on noise would be considered similar to the project.

**Geologic Conditions.** The proposed project would be required to adhere to the California Building Code and appropriate state-of-the-art seismic design parameters of the Structural Engineers Association of California, which would minimize to the extent possible seismic risks associated with developing at the project site. Additionally, the proposed project would not result in a substantial increase in wind or water erosion of soils, either on or off the site. Therefore, no significant environmental impacts associated with geologic conditions would occur.

Like the project, development of the project site as a Reduced Density alternative would not result in impacts to geologic conditions and would require that development comply with the California Building Code. Therefore, when compared to the proposed project, this alternative would have the same impact.

**Paleontological Resources.** The proposed project does not have the potential to impact paleontological resources; excavation quantities would not exceed the City's thresholds, and grading would not occur within geologic formations known to exhibit paleontological resources. No mitigation would be required.

Development under the Reduced Density alternative would require a similar amount of grading as the proposed project. Like the proposed project, this alternative would not have the potential to impact paleontological resources; grading would not occur within geologic formations known to exhibit paleontological resources. When compared to the proposed project, impacts associated with paleontological resources would be the same.

**Historical Resources.** 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. Although no historical resources were identified within the boundaries of the project site, recorded sites have been identified within proximity to the project site. Due to the sensitivity of the area, potentially significant impacts to unknown subsurface archeological resources could result during ground-disturbing activities. In order to mitigate potential impacts to unknown subsurface archaeological resources, archaeological monitoring

would be required in areas of the project site not impacted by the construction of the existing building, such as the landscaped areas and parking lots surrounding the existing building.

The Reduced Density alternative would have the same level of potential impacts to unknown subsurface resources as the project. Monitoring would be required, as with the project, to mitigate potential impacts to below a level of significance.

**Hydrology.** While the proposed project would result in an increase in impervious surfaces from what exists today, it would result in an overall decrease in peak runoff and would not result in significant impacts to drainage patterns. The proposed project would also not result in flood hazards to the project site or impose flood hazards on other properties, because the project development would elevate the project site out of the 100-year floodplain. No significant impacts associated with the site's hydrology are anticipated.

Development of the project site as a Reduced Density alternative project would result in grading similar to the project. Like the proposed project, no significant impacts associated with drainage and runoff would be expected to occur under this alternative. Also like the project, this alternative would be required to elevate structures out of the 100-year floodplain and would not result in flood hazards. Therefore, when compared to the project, relative to hydrology, this alternative would result in the same level of impacts.

**Water Quality.** Property modifications associated with the proposed project are not expected to substantially affect the quality of storm water runoff leaving the site compared to existing conditions, because the project would implement BMPs to minimize the impacts of post-construction activities on the quality and quantity of storm water to the maximum extent practicable. In addition, BMPs would be implemented to control the construction sources of potential storm water pollutants. The proposed project would result in less runoff than what currently exists and would eliminate expanses of open parking areas that generate pollutants, therefore improving site conditions. Implementation of the proposed BMPs would preclude significant potential impacts to water quality.

The Reduced Density alternative would result in the construction of a mixed-use development with residential commercial office and commercial retail uses similar to the proposed project. Parking would be provided in surface lots and/or parking structures. Like the proposed project, this alternative would be required to implement BMPs and LIDs directed at minimizing water quality impacts. Therefore, this alternative would result in similar impacts to water quality when compared with the proposed project.

**Pubic Services and Facilities.** The project site is currently developed with existing structures and on-site surface parking. Existing development is served by public service facilities, such as fire/life safety protection and police projection. The proposed project would not result in significant impacts

to police protection, fire/life safety protection, libraries, parks or other recreation facilities, and schools.

The Reduced Density alternative would have a similar demand on public services for police protection and fire and safety as the project. This alternative would have a lower residential unit count and generate a smaller residential population that use school, library, and recreational services. In this manner, this alternative's impact on public services would be slightly less than the proposed project. Nonetheless, the proposed project would not result in a significant impact to public services and facilities.

**Public Utilities.** The project would not result in significant impacts to water, sewer, solid waste, and communications systems. The Reduced Density alternative's impact on public utilities would be similar to the proposed project. Like the proposed project, no impacts are anticipated under this alternative.

**Health and Safety.** The project would be designed in accordance with applicable safety standards and would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans. The project site is not listed as a hazardous materials site. Industry standards in place would insure no risk to workers by hazardous materials during demolition and construction. Although the project site is within the AIAs of San Diego International Airport and Montgomery Field Airport, the proposed project would not result in impacts associated with the respective ALUCPs. As a result, the project would not result in impacts associated with health and safety.

There are no current health risks relative to surrounding hazardous materials handlers that would be regarded as significant for the Reduced Density alternative. Additionally, the Reduced Density alternative would be consistent with the ALUCPs for San Diego International Airport and Montgomery Field. Like the proposed project, this alternative would not result in any significant impacts relative to health and safety.

**Tribal Cultural Resources.** Although no tribal cultural resources were identified within the boundaries of the project site, recorded sites have been identified within proximity to the project site. Due to the sensitivity of the area, potentially significant impacts to unknown subsurface archeological resources could result during ground-disturbing activities. In order to mitigate potential impacts to unknown subsurface archaeological resources, archaeological monitoring would be required in areas of the project site not impacted by the construction of the existing building, such as the landscaped areas and parking lots surrounding the existing building.

The Reduced Density alternative would have the same level of potential impacts to unknown subsurface resources as the project. Monitoring would be required, as with the project, to mitigate potential impacts to below a level of significance.

**Cumulative Effects.** As presented in Section 6.0, *Cumulative Effects*, of this EIR, the project would result in cumulative impacts which, when considered together with other past, present, and reasonably future projects, are considerable or which compound or increase other environmental impacts to Transportation/Traffic Circulation/Parking. The Reduced Density alternative, would not result in cumulative impacts to street segments along Camino de la Reina. This alternative would not result in any cumulatively significant impacts.

#### **Evaluation of Alternative**

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 some of the project objectives. Specifically, this alternative would meet six of the 11 project's objectives:

- 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.
- 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.
- 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 trips, thereby reducing the amount of routine daily trips.

This alternative 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 alterative 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.

### 9.4 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 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.

Table 9-6.	Comparison	of Alternatives	to Proposed	Project
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Environmental Issue Area Proposed Project	Proposed Project	Alternative 1 No Project/No Build	Alternative 2 Reduced Density		
Land Use	No significant impacts.	Same as project.	Same as proposed project.		
Transportation/ Traffic Circulation/Parking	Fully mitigated cumulative street segment impact.	No impacts, as no new trips would be generated.	No significant impacts, due to less ADT.		
Visual Quality/ Neighborhood Character	No significant impacts.	Same as project.	Same as proposed project.		
Air Quality	No significant impacts.	Less than proposed project, because no traffic generated.	Less than proposed project, because less ADT.		
Greenhouse Gas Emissions	No significant impacts.	Less than proposed project, because no traffic generated.	Less than proposed project, because less ADT.		
Energy	No significant impacts.	No significant impacts.	Same as proposed project.		
Noise	No significant impacts.	Less than proposed project, because no traffic generated and no construction noise.	Same as proposed project.		
Geologic Conditions	No significant impacts.	Potential increase in seismic risk.	Same as proposed project.		
Paleontological Resources	No significant impacts.	No significant impacts.	Same as proposed project.		
Historical Resources	Potential impacts to unknown subsurface resources.	No impacts, because no new development.	Same as proposed project.		
Hydrology	No significant impacts.	Greater than proposed project due to flood potential.	Same as proposed project.		
Water Quality	No significant impacts.	Greater impacts, because of existing uses, no BMPs, no LIDs.	Same as proposed project.		
Public Services and Facilities	No significant impacts.	Less than proposed project, because no new development.	Less demand on public services and utilities than proposed project, because would provide fewer residential units.		
Public Utilities	No significant impacts.	Less than proposed project, because no new development.	Same as proposed project.		
Health and Safety	No significant impacts.	No significant impacts.	Same as proposed project.		
Tribal Cultural Resources	Potential impacts to unknown subsurface resources.	No impacts, because no new development.	Same as proposed project.		
Cumulative Effects	Fully mitigated cumulative street	No impacts.	No significant impacts.		

# 10.0 MITIGATION MONITORING AND REPORTING PROGRAM

CEQA, Section 21081.6, requires that a mitigation monitoring and reporting program (MMRP) be adopted upon certification of an EIR to ensure that the mitigation measures are implemented. The mitigation monitoring and reporting program specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.

The proposed project is described in the Alexan Fashion Valley project EIR. The EIR, incorporated herein as referenced, focuses on issues determined to be potentially significant by the City of San Diego. The issues addressed in the EIR include land use, transportation/traffic circulation/parking, visual effects and neighborhood character, air quality, global climate change, energy, noise, geology and soils, paleontological resources, historical resources, hydrology, water quality, public facilities and services, public utilities, and health and safety.

PRC section 21081.6 requires the monitoring of measures proposed to mitigate significant environmental effects. Issues related to transportation/traffic circulation/parking, geologic conditions, historical resources, and tribal cultural resources were determined to be potentially significant and require mitigation as described in this EIR. All issues will be fully mitigated to below a level of significance with implementation of mitigation measures.

The mitigation monitoring and reporting program for the proposed project is under the jurisdiction of San Diego and other agencies as specified in the table below. The mitigation monitoring and reporting program for the proposed project addresses only the issue areas identified above as potentially significant. The following is an overview of the mitigation monitoring and reporting program to be completed for the project.

# 10.1 Monitoring Activities

Monitoring activities would be accomplished by individuals identified in the attached MMRP table. While specific qualifications should be determined by the City of San Diego, the monitoring team should possess the following capabilities:

- Interpersonal, decision-making, and management skills with demonstrated experience in working under trying field circumstances;
- Knowledge of and appreciation for the general environmental attributes and special features found in the project area;
- Knowledge of the types of environmental impacts associated with construction of costeffective mitigation options; and
- Excellent communication skills.

### **10.2 Program Procedures**

Prior to any construction activities, meetings should take place between all the parties involved to initiate the monitoring program and establish the responsibility and authority of the participants. Mitigation measures that need to be defined in greater detail would be addressed prior to any project plan approvals in follow-up meetings designed to discuss specific monitoring effects.

An effective reporting system must be established prior to any monitoring efforts. All parties involved must have a clear understanding of the mitigation measures as adopted and these mitigations must be distributed to the participants of the monitoring effort. Those that would have a complete list of all the mitigation measures adopted by the City of San Diego would include the City of San Diego and its Mitigation Monitor. The Mitigation Monitor would distribute to each Environmental Specialist and Environmental Monitor a specific list of mitigation measures that pertain to his or her monitoring tasks and the appropriate time frame that these mitigations are anticipated to be implemented.

In addition to the list of mitigation measures specified in the table below, the monitors would have mitigation monitoring report (MMR) forms, with each mitigation measure written out on the top of the form. Below the stated mitigation measure, the form shall have a series of questions addressing the effectiveness of the mitigation measure. The monitors shall complete the MMR and file it with the MMC Section following the monitoring activity. The MMC shall then include the conclusions of the MMR into an interim and final comprehensive construction report to be submitted to the City of San Diego. This report shall describe the major accomplishments of the monitoring program, summarize problems encountered in achieving the goals of the program, evaluate solutions developed to overcome problems, and provide a list of recommendations for future monitoring programs. In addition, and if appropriate, each Environmental Monitor or Environmental Specialist shall be required to fill out and submit a daily log report to the Mitigation Monitor. The daily log report would be used to record and account for the monitoring activities of the monitor. Weekly and/or monthly status reports, as determined appropriate, shall be generated from the daily logs and compliance reports and shall include supplemental material (e.g., memoranda, telephone logs, and letters).

# **10.3 Summary of Project Impacts and Mitigation Measures**

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

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

- In addition, the ED shall verify that <u>the MMRP Conditions/Notes that apply ONLY to</u> <u>the construction phases of this project are included VERBATIM</u>, under the heading, "ENVIRONMENTAL/MITIGATION REQUIREMENTS."
- These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:
  <a href="http://www.sandiego.gov/development-services/industry/standtemp.shtml">http://www.sandiego.gov/development-services/industry/standtemp.shtml</a>
- 4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
- 5. **SURETY AND COST RECOVERY –** The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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

1. **PRE CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants: **Not applicable.** 

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

#### CONTACT INFORMATION:

a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858-627-3200** 

- b) For Clarification of ENVIRONMENTAL REQUIREMENTS, applicant t is also required to call **RE and MMC at 858-627-3360**
- 2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) Number 474586 and/or Environmental Document Number 474586, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

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

- 3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency: **Not Applicable**
- 4. **MONITORING EXHIBITS:** All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.
- 5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:
| DOCUMENT SUBMITTAL/INSPECTION CHECKLIST |  |  |  |  |  |  |  |  |
|---|--|--|--|--|--|--|--|--|
| lssue Area                              | Document Submittal                             | Associated Inspection/Approvals/Notes                  |  |  |  |  |  |  |
| General                                 | Consultant Qualification Letters               | Prior to Preconstruction Meeting                       |  |  |  |  |  |  |
| General                                 | Consultant Construction Monitoring<br>Exhibits | Prior to or at Preconstruction Meeting                 |  |  |  |  |  |  |
| Waste<br>Management                     | Waste Management Reports                       | Waste Management Inspections                           |  |  |  |  |  |  |
| Historical<br>Resources                 | Records Search/Monitoring Report(s)            | Monitoring Report(s) Approval                          |  |  |  |  |  |  |
| Bond Release                            | Request for Bond Release Letter                | Final MMRP Inspections Prior to Bond<br>Release Letter |  |  |  |  |  |  |

### C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

The following table (Table 10-1, *Mitigation Monitoring and Reporting Program*) summarizes the potentially significant project impacts and lists the associated mitigation measures and the monitoring efforts necessary to ensure that the measures are properly implemented. All the mitigation measures identified in the EIR are stated herein.

Potential Significant Impact Mitigation Measure(s)		Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Transportation/Traffic Circulation/Parking	•	•	
<b>Impact 5.2-1:</b> 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.	MM 5.2-1 Camino de la Reina: Hotel Circle North to Driveway 1 Owner/permittee shall provide an IOD and DIA for the widening of Camino De La Reina along the project frontage. In addition, owner/permittee shall 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.	First Building Permit	City of San Diego
<b>Impact 5.2-2:</b> 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.	<b>MM 5.2-2 Camino de la Reina: Driveway 2 to Avenida del Rio</b> Owner/permittee shall provide an IOD and DIA for the widening of Camino De La Reina along the project frontage. In addition, the owner/permittee shall 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.	First Building Permit	City of San Diego
Geologic Conditions			
Impact 5.8-1: Geologic conditions on-site allow for the potential of liquefaction	<b>MM 5.8-1</b> 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.	First Building Permit	City of San Diego

Table 10-1. Mitigation Monitoring and Reporting Program

Impact 5.10-1: The proposed project could	MM 5.10-1	During Grading	City of San
result in direct impacts to unknown	Implementation of the following mitigation measures would		Diego
subsurface archaeological resources as a	reduce any potential impacts to historical resources		
result of excavation and trenching for the	(archaeology):		
project.			
	I. Prior to Permit Issuance		
Impact 5.10-2: The proposed project could	A. Entitlements Plan Check		
result in direct impacts to subsurface	1. Prior to issuance of any construction permits, including		
archaeological resources – specifically, human	but not limited to, the first Grading Permit, Demolition		
remains – as a result of project excavation	Plans/Permits and Building Plans/Permits or a Notice to		
and trenching.	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		
	nrocess		
	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		
	manifes of all persons involved in the alchaeological		
	Historical Posources Guidelines (HPG). If applicable		
	individuals involved in the archaeological monitoring		
	program must have completed the 40 hour HAZWORED		
	program must have completed the 40-hour HAZWOPER		
	MMC will provide a letter to the applicant confirming		
	2. Mine will provide a letter to the applicant community		
	the archaeological monitoring of the project most the		
	the archaeological monitoring of the project meet the		
	qualifications established in the HKG.		
	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		

Α.	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.	
В.	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	

<ul> <li>the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.</li> <li>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).</li> <li>3. When Monitoring Will Occur <ul> <li>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.</li> </ul> </li> </ul>
<ul> <li>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.</li> </ul>
III. During Construction
A. Monitor(s) Shall be Present During Grading/ Excavation/
Trenching
<ol> <li>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</li> </ol>
modification of the AME.
2. I ne Native American consultant/monitor shall

	determine the extent of their presence during soil	
	disturbing and grading/excavation/trenching activities	
	based on the AME and provide that information to the	
	PI and MMC. If prehistoric resources are encountered	
	during the Native American consultant/monitor's	
	absence, work shall stop and the Discovery	
	Notification Process detailed in Section III.B-C and	
	IV.A-D shall commence.	
	3. The PI may submit a detailed letter to MMC during	
	construction requesting a modification to the	
	monitoring program when a field condition such as	
	modern disturbance post-dating the previous	
	grading/trenching activities, presence of fossil	
	formations, or when native soils are encountered that	
	may reduce or increase the potential for resources to	
	be present.	
	4. The archaeological and Native American	
	consultant/monitor shall document field activity via	
	the Consultant Site Visit Record (CSVR). The CSVR'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.	
В.	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 PL_MMC will notify the appropriate
	Senior Planner in the Environmental Analysis Section
	(FAS) of the Development Services Department to assist
	with the discovery notification process
	2 The PL 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
	overlav 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 PL will
	determine the need for a field examination to
	determine the provenance
	2 If a field examination is not warranted the Medical
	5. If a new examination is not warranted, the Medical Examiner will determine with input from the PL if the
	remains are or are most likely to be of Native American
	C If Human Remains <b>ARE</b> determined to be Native American
	1 The Medical Examiner will notify the Native American
	Heritage Commission (NAHC) within 24 hours. By Jaw
	<b>ONLY</b> the Modical Examiner can make this call
	2 NAUC will immediately identify the person or persons
	determined to be the Most Likely Descendent (MLD)
	and provide contact information
	and provide contact information.
	5. The WILD Will contact the PT Within 24 hours of soofier
	arter 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	
	remeered with appropriate digitity, pursuant to	1

	Section 5.c., above.
D.	If Human Remains are <b>NOT</b> 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.
٧.	Night and/or Weekend Work
Α.	If night and/or weekend work is included in the contract
	1. When night and/or weekend work is included in the
	contract package, the extent and timing shall be
	presented and discussed at the precon meeting.
	2. The following procedures shall be followed.
	a. No Discoveries
	In the event that no discoveries were encountered
	during night and/or weekend work, the PI shall
	record the information on the CSVR and submit to
	MMC via fax by 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
	of the next business day to report and discuss the

	findings as indicated in Section III-B, unless other	
	specific arrangements have been made.	
В.	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.	
В.	На	ndling 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.	Cu	ration of artifacts: Accession Agreement and Acceptance	
	Ve	rification	
	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 Accentance Verification from	
		the curation institution in the Final Monitoring Report	
		submitted to the RE or BL and MMC	
	З	When applicable to the situation, the PI shall include	
	5.	written verification from the Native American	
1			

	<ul> <li>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.</li> <li>D. Final Monitoring Report(s)</li> <li>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.</li> <li>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.</li> </ul>		
Tribal Cultural Resources			
Impact 5.16-1: The proposed project could result in direct impacts to unknown subsurface tribal cultural resources (archaeological), as a result of excavation and trenching for the project.	<b>MM 5.10-1</b> (see Historical Resources above)	During grading	City of San Diego

# **11.0 REFERENCES**

A list of the reference materials consulted in the course of the EIR's preparation is included in this section.

- Airport Land Use Compatibility Plan for Montgomery Field
- Airport Land Use Compatibility Plan for San Diego International Airport
- ASM Affiliates. Archeological Resource Report Form for the Alexan Fashion Valley Project. (March 12, 2015).
- CalRecycle, Solid Waste Information System (2017)
- CalFire, Fire Hazard Severity Zone Map. (June 12, 2009)
- KLR Planning. Waste Management Plan. (July 2016)
- Leighton and Associates, Inc. *Geotechnical Investigation*. (February 24, 2016).
- LSA Associates, Inc. *Noise Impact Analysis.* (August 2016).
- Nasland Engineering. *Preliminary Storm Water Quality Management Plan (SWQMP).* (August 24, 2016).
- Nasland Engineering. *Preliminary Hydrology Study.* (July 5, 2016).
- Mission Valley Community Plan
- San Diego, City of. *General Plan.* (March 2008).
- San Diego, City of. *Development Services Department, Significance Determination Thresholds.* (January 2011).
- San Diego, City of. *Climate Action Plan. (2015).*
- San Diego, City of. *Land Development Code*.
- San Diego, City of. *MSCP Subarea Plan*. (1997).
- San Diego, City of. *Environmental Impact Report Guidelines* (1992; Revised 2005).
- San Diego, City of. Fire and Rescue Department Correspondence. (April 5, 2017).
- San Diego, City of. Police Department Correspondence. (January 27, 2017).
- San Diego River Park Master Plan
- San Diego Regional Air Quality Strategy
- San Diego Regional Comprehensive Plan
- 2050 Regional Transportation Plan/Sustainable Communities Strategy
- Scientific Resources Associated. *Air Quality Technical Report for the Fashion Valley Apartments Project.* (July 6, 2016).
- Scientific Resources Associated. *Greenhouse Gas Evaluation for the Fashion Valley Apartments Project*. (July 6, 2016).
- Urban Systems Associates, Inc. *Focused Traffic Impact Analysis for the Alexan Fashion Valley Project.* (June 28, 2016).
- Water Quality Control Plan for the San Diego Basin

# 12.0 INDIVIDUALS AND AGENCIES CONSULTED

Agencies and individuals contacted during preparation of the EIR are identified in this section.

### City of San Diego

Environmental Analysis Section

- Kerry Santoro, Deputy Director
- Jeff Szymanski, Senior Planner

Development Services Department

- John Fisher, Development Project Manager
- Tim Daly, Development Project Manager
- Farah Mahzari, Development Project Manager/Transportation

### Planning Department

- Brian Schoenfisch, Program Manager
- Nancy Graham, Senior Planner

### San Diego Unified School District

• Sarah Hudson, Demographer

# **13.0 CERTIFICATION**

This document has been completed by the City of San Diego's Environmental Analysis Section, under the direction of the Development Services Department Environmental Review Manager. This EIR is based on independent analysis and determination made pursuant to the San Diego Land Development Code Section 128.0103.

Provided below is a list of City of San Diego staff, as well as the environmental and technical consultants, who assisted in preparing this document.

### City of San Diego

Development Services Department and Environmental Analysis Section

- John Fisher, Development Project Manager
- Tim Daly, Development Project Manager
- Farah Mahzari, Development Project Manager/Transportation
- Jeff Szymanski, Senior Planner
- Kerry Santoro, Deputy Director

### Planning Department

- Brian Schoenfisch, Program Manager
- Nancy Graham, Senior Planner

#### **EIR Preparation and Management**

KLR PLANNING

- Karen L. Ruggels, Project Manager
- Brittany Erin Ruggels, Environmental Analyst/Planner
- Jennifer Clemente, Environmental Analyst/Planner
- Joseph Villapando, Environmental Analyst/Planner

#### **Drainage Study**

Nasland Engineering

• Corey Schrack

#### Air Quality Technical Report

Scientific Resources Associated

• Valorie Thompson, PhD

#### **Exterior Noise Analysis Report**

LSA Associates, Inc.

• Tung-Chen Chung, Ph.D., INCE Bd. Cert.

### **Geotechnical Investigation**

Leighton and Associates, Inc.

• Bob Stroh

### Global Climate Change Evaluation

Scientific Resources Associated

• Valorie Thompson, PhD

### **Traffic Impact Analysis**

Urban Systems Associates, Inc.

• Justin P. Schlaefli, MCE

#### Waste Management Plan

KLR PLANNING

• Brittany Ruggels

### Storm Water Quality Management Plan

Nasland Engineering

• Corey Schrack