



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: April 5, 2018

PUBLIC NOTICE

**OF THE PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT
AND SCOPING MEETING**

WBS No. S-15027.02.06

PUBLIC NOTICE: The City of San Diego, as lead agency, has determined that the project described below will require the preparation of an Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of an EIR and Scoping Meeting was publicly noticed and distributed on April 5, 2018. This notice was published in the *San Diego Daily Transcript* and placed on the City of San Diego website at <http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>.

SCOPING MEETING: A public scoping meeting will be held by the City of San Diego's Development Services Department on Thursday, April 19, 2018 from 5:30 p.m. to 7:30 p.m. at the La Jolla Recreation Center Auditorium, located at 615 Prospect Street, La Jolla, California, 92037. The meeting will consist of an open house with information stations. Participants may arrive at any time during this open house meeting. Public comments regarding the scope and alternatives of the proposed EIR may be provided orally (recorded via court reporter) or in writing at the meeting.

Written/mail-in comments may also be sent during the 30-day public scoping period to the following address: Mark Brunette, Senior Environmental Planner, City of San Diego Development Services Department, 1222 First Avenue, MS 501, San Diego, California 92101, or via email to DSDEAS@sandiego.gov. Due to the time limits mandated by State law, comments must be received by Monday, May 7, 2018. Include the project name and number in the subject line. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. An EIR incorporating public input will then be prepared and distributed for the public to review and comment.

Project Name/No.: La Jolla View Reservoir Project EIR / 331101

Community Area: La Jolla

Council District: 1

Project Description: The City of San Diego will prepare an Environmental Impact Report to evaluate the effects of the proposed La Jolla View Reservoir project. The proposed project would replace the existing Exchange Place Reservoir and La Jolla View Reservoir with a new 3.1-million-gallon reservoir within the La Jolla Natural Park. The existing reservoirs and the Exchange Place Pump Station would be demolished. The proposed new reservoir would be almost entirely buried, except for reservoir access hatches and supervisory control and data acquisition equipment. The new reservoir would include an approximately 160-foot-long, 18-inch overflow pipe with an at-grade outlet and energy

dissipation structure. In addition, an 8-inch utility water connection to the new reservoir would be provided from the existing water main in Brodiaea Way.

The project also includes construction of approximately 2,700 linear feet of 30-inch pipeline. The pipeline would run from the new La Jolla View Reservoir in a general east-to-west direction through the La Jolla Natural Park to connect with the existing 16-inch Muirlands pipeline in County Club Drive. Approximately 1,050 linear feet of the 2,700 linear feet total would be replacing the 16-inch pipeline up to the existing Muirlands Pump Station. In addition, approximately 780 feet of an 8-inch pipeline would parallel the 30-inch pipeline along Country Club Drive to serve existing customers. An altitude valve vault would be located along the pipeline adjacent to Country Club Drive. The existing pipeline segment through the La Jolla Natural Park would be abandoned in place.

An existing paved access road from Encelia Drive would be reconstructed to allow access to the new reservoir site for maintenance vehicles. This road would terminate at the reservoir access hatches where two parking spaces and paved turnaround area would be provided. The remaining portion of the existing access road to the existing La Jolla View Reservoir would be demolished, and the area would be revegetated.

Figure 1 shows the existing and proposed project facilities.

Applicant: City of San Diego, Public Works Department

Recommended Finding: Pursuant to Section 15060(d) of the CEQA Guidelines, it appears that the proposed project may result in significant environmental impacts in the following areas: Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Health and Safety, Hydrology/Water Quality, Land Use, Noise, Paleontological Resources, Transportation/Circulation, Utilities and Service Systems, and Visual Quality and Neighborhood Character.

Availability in Alternative Format: To request this Notice of the City's letter to the applicant detailing the required scope of work (EIR Scoping Letter) in alternative format, call the Development Services Department at 619.446.5189.

Additional Information: For environmental review information, contact Mark Brunette at 619.446.5379. The Scoping Letter and supporting documents may be reviewed, or purchased for the cost of reproduction, in the Development Services Department on the 5th Floor of the Development Services Center. For information regarding public meetings/hearings on the project, contact the Project Manager, Ed Fordan, at 619.533.4162 or via email: efordan@sandiego.gov. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on April 5, 2018.



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Source: IEC 2017

April 5, 2018

Mr. Ed Fordan
Project Manager
City of San Diego
Public Works Department, Project Implementation Division
525 B Street, Suite 750
San Diego, CA 92101

Subject: **Scope of Work for an Environmental Impact Report for the La Jolla View Reservoir Project (Project Tracking System No. 331101)**

Dear Mr. Fordan:

Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the environmental review staff of the Development Services Department of the City of San Diego has determined that the La Jolla View Reservoir Project (Project) may have significant effects on the environment, and the preparation of an Environmental Impact Report (EIR) is required. Staff has determined that a Project EIR is the appropriate environmental document.

The purpose of this letter is to identify the issues to be specifically addressed in the EIR. The EIR shall be prepared in accordance with the City's "Technical Report and Environmental Impact Report Guidelines," (updated December 2005). A copy of the current guidelines is attached.

A Notice of Preparation (NOP) will be distributed to the Responsible Agencies and others who may have an interest in the Project as required by CEQA Guidelines Section 15082. CEQA Guidelines Section 21083.9(a)(2) requires scoping meetings for projects that may have statewide, regional, or area-wide environmental impacts. The City's environmental review staff has determined that this Project meets this threshold. A public scoping meeting has been scheduled for Thursday, April 19th, from 5:30 p.m. to 7:30 p.m. at the La Jolla Recreation Center Auditorium, located at 615 Prospect Street, La Jolla, CA 92037. Please note that, depending upon the number of attendees, the meeting could end earlier than 7:30 p.m.

Changes or additions to the scope of work may be required as a result of input received in response to the NOP and Scoping Meeting. In addition, the applicant may need to adjust the Project over time through the discretionary review process, and these changes would be disclosed in the EIR under the section "History of Project Changes" and accounted for in the EIR impact analysis to the extent required by CEQA.

Each section and issue area of the EIR shall provide a descriptive analysis of the proposed Project followed by a comprehensive evaluation. The EIR shall also include sufficient graphics and tables, which, in conjunction with the relevant narrative discussions, provide a complete and meaningful description of all major Project features, the environmental impacts of the Project, as well as cumulative impacts, mitigation of significant impacts, and alternatives to the Project.

PROJECT DESCRIPTION

Discretionary Approvals

Proposed discretionary actions include a Site Development Permit (SDP) and a Coastal Development Permit (CDP). An SDP is required because the Project proposes development that would impact environmentally sensitive lands (ESL). A CDP is required because the Project proposes development within the Coastal Overlay Zone.

Location of Project

The Project is generally located in the 42-acre La Jolla Natural Park (a part of City Parks and Recreation Open Space), which is generally bounded by County Club Drive to the west; residences off Remley Place, Brodiaea Way, and Encelia Drive to the south; additional open space to the east; and residences off Valdes Drive to the north (see Figures 1 and 2). The existing La Jolla View Reservoir is located in the La Jolla Natural Park, approximately 500 feet east of Country Club Drive and 150 feet north of the Remley Place residences. In addition, the Exchange Place Reservoir is located east of the intersection of Country Club Drive and Pepita Way, outside of the park limits. Improvements also would occur along Country Club Drive between Soledad Avenue and Romero Drive.

The Project site is located within the La Jolla Community Plan (LJCP) area, which designates the Project site for "Parks, Open Space." Surrounding uses include single-family residences to the north, south, and west, open space to the east, and a golf course to the southwest (see Figure 2).

Background

The existing La Jolla View Reservoir is a 0.72-million gallon (MG) potable water storage facility that was constructed in 1949. The existing 0.99-MG La Jolla Exchange Place Reservoir was originally constructed in 1909 and was decommissioned in 2002. Use of the existing La Jolla View Reservoir is very limited due to higher-pressure zone and other water system changes. Water quality in the reservoir is also poor and requires supplemental chlorine treatment when in operation. In addition, the existing 16-inch diameter cast iron Muirlands Pipeline that supplies water to the existing La Jolla View Reservoir is beyond its useful life, and is undersized for current water conveyance requirements.

Project Description

The proposed Project would replace the existing Exchange Place Reservoir and La Jolla View Reservoir with a new 3.1-million-gallon reservoir within the La Jolla Natural Park (see Figure 3). The

existing reservoirs and the Exchange Place Pump Station would be demolished. The proposed new reservoir would be almost entirely buried, except for reservoir access hatches and supervisory control and data acquisition equipment. The new reservoir would include an approximately 160-foot-long, 18-inch overflow pipe with an at-grade outlet and energy dissipation structure. The outlet would be situated near the head of the north-central on-site drainage. In addition, an 8-inch utility water connection to the new reservoir would be provided from the existing water main in Brodiaea Way.

The Project also includes construction of approximately 2,700 linear feet of 30-inch pipeline. The pipeline would run from the new La Jolla View Reservoir in a general east-to-west direction through the La Jolla Natural Park to connect with the existing 16-inch Muirlands pipeline in County Club Drive. Approximately 1,050 linear feet of the 2,700 linear feet total would be replacing the 16-inch pipeline up to the existing Muirlands Pump Station. In addition, approximately 780 feet of an 8-inch pipeline will parallel the 30-inch pipeline along Country Club Drive to serve existing customers. An altitude valve vault will be located along the pipeline adjacent to Country Club Drive. The existing pipeline segment through the La Jolla Natural Park would be abandoned in place.

An existing paved access road from Encelia Drive would be reconstructed to allow access to the new reservoir site for maintenance vehicles. This road would terminate at the reservoir access hatches where two parking spaces and paved turnaround area will be provided. The remaining portion of the existing access road to the existing La Jolla View Reservoir would be demolished, and the area would be revegetated.

Grading and Construction

Excavation to install the new reservoir would result in approximately 76,000 cubic yards (cy) of cut. Of this volume, approximately 22,000 cy would be permanently disposed off site, requiring approximately 4,500 truck trips. The remainder (54,000 cy) would be temporarily stockpiled on site, including use of a proposed temporary access road that would run from the new reservoir site to the stockpile area within La Jolla Natural Park near Country Club Drive. Once the reservoir is installed, the stockpiled soil would be backfilled into the new reservoir location and to cover the temporary access road. The backfilled areas would be revegetated.

Extended construction hours would be required for certain activities, such as pouring the reservoir footings, walls, and roof, as well as laying pipeline along Country Club Drive.

EIR FORMAT/CONTENT REQUIREMENTS

The EIR serves to inform governmental agencies and the public of a project's environmental impacts. Emphasis in the EIR must be on identifying feasible solutions to environmental impacts. The objective is not to simply describe and document an impact, but to actively create and suggest mitigation measures or project alternatives to substantially reduce the significant adverse environmental impacts. The adequacy of the EIR will depend greatly on the thoroughness of this effort.

The EIR must be written in an objective, clear, and concise manner, utilizing plain language. The use of graphics is encouraged to replace extensive word descriptions and to assist in clarification. Conclusions must be supported with quantitative, as well as qualitative, information, to the extent feasible. **The entire environmental document must be left justified. In addition, the environmental document is required to utilize Opens Sans, 10 pitch font.**

I. CONCLUSIONS

Prior to the distribution of the Draft EIR for public review, Conclusions, which are attached at the front of the Draft EIR, will also need to be prepared. The Conclusions cannot be prepared until an approved draft has been submitted and accepted by the City.

II. TITLE PAGE

The EIR shall include a Title Page that includes the Project name, Project Tracking System (PTS) number, State Clearinghouse (SCH) number, and the date of publication. DO NOT include any applicant's or consultant's company logos or names.

III. TABLE OF CONTENTS

The Table of Contents must list all sections included in the EIR, as well as the Appendices, Tables, and Figures. Immediately following the Table of Contents, a list of acronyms and abbreviations utilized in the text must be provided.

IV. EXECUTIVE SUMMARY

The consultant will prepare the Executive Summary to be submitted for review with the last screencheck Draft EIR, unless otherwise determined. The Executive Summary shall have an independent numbering system (e.g., S-1, S-2). In general, the Executive Summary shall reflect the EIR outline, but need not contain every element of the EIR. At a minimum, the Executive Summary must include a brief Project description; impacts determined to be significant (including cumulative); impacts found to be less than significant; alternatives; areas of controversy; and lastly a matrix listing the impacts and mitigation. Please refer to the Environmental Impact Report Guidelines for further detailed information.

V. INTRODUCTION

The EIR shall introduce the Project with a brief discussion on the intended use and purpose of the EIR. This discussion shall focus on the type of analysis that the EIR is providing and provide an explanation of why it is necessary to implement the Project. This section shall describe and/or incorporate by reference any previously certified environmental documents that cover the Project site including any EIRs. This section shall briefly describe areas where the Project is in compliance or non-compliance with assumptions and mitigation contained in these previously certified documents. Additionally, this section shall provide a brief description of any other local, state, and federal agencies that may be involved in the Project review and/or any grant approvals.

VI. ENVIRONMENTAL SETTING

The EIR shall describe the precise location of the Project site with an emphasis on the physical features of the sites and the surrounding area and present it on a detailed topographic map and a regional map. Provide a local and regional description of the environmental setting of the Project, as well as any adjacent land uses, area topography, drainage characteristics, and vegetation. Describe any upcoming changes to the area and any cumulative changes that may relate to the Project site. Include the existing and planned land uses in the vicinity, on-and off-site resources, the community plan area land use designation(s), existing zoning, all utility easements and any required maintenance access, and any overlay zones within this section. Include any applicable land use plans/overlay zones that affect the Project site, such as the City of San Diego's Multiple Species Conservation Program (MSCP)/Multi-Habitat Planning Area (MHPA), environmentally sensitive lands such as steep hillsides, wetlands, and the Federal Emergency Management Agency (FEMA) 100-year floodplains and/or floodways that intersect with the Project components. Provide a recent aerial photo of the Project site and surrounding uses, and clearly identify the Project location.

VII. PROJECT DESCRIPTION

The EIR shall include a detailed discussion of the goals and objectives of the Project, in terms of public benefit. Project objectives will be critical in determining the appropriate alternatives for the Project, which would avoid or substantially reduce potentially significant impacts. As stated in CEQA Guidelines Section 15124(b), "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision makers in adopting findings and/or a statement of overriding considerations, if necessary. The statement of objectives shall include the underlying purpose of the project."

This section shall describe all discretionary actions needed to implement the Project (i.e., CDP and SDP) including all permits required from federal, state, and local agencies. If other agencies have responsibility for approvals or Project review, describe this involvement. The description of the Project shall include all major Project features, including demolition of existing facilities, grading (cut and fill), reservoir and pipeline construction, and ancillary facilities associated with the Project. The Project description shall describe any off-site activities necessary to construct the Project. The EIR shall include sufficient graphics and tables to provide a complete description of all major Project features. This discussion shall address the whole of the Project.

VIII. HISTORY OF PROJECT CHANGES

This section of the EIR shall outline the history of the Project and any physical changes that have been made to the Project in response to environmental concerns identified during the review of the Project (i.e., in response to NOP or public scoping meetings or during the public review period for the Draft EIR).

IX. ENVIRONMENTAL IMPACT ANALYSIS

The potential for significant environmental impacts must be thoroughly analyzed and mitigation measures identified that would avoid or substantially lessen any significant impacts. The City of San Diego is the Lead Agency for this Project, and therefore the EIR must represent the independent analyses of the Lead Agency. Accordingly, all impact analysis must be based on the City's "Significance Determination Thresholds" (July 2016) unless otherwise directed by the City. Below are key environmental issue areas that have been identified for this Project, within which the issue statements must be addressed individually.

Discussion of each issue statement shall include an explanation of the existing Project site conditions, impact analysis, significance determination, and appropriate mitigation. The impact analysis shall address potential direct, indirect, and cumulative impacts that could be created through implementation of the Project and its alternatives. Lastly, the EIR shall summarize each required technical study or survey report within each respective issue section, and all requested technical reports must be included as the appendices to the EIR and summarized in the text of the document.

In each environmental issue section, mitigation measures to avoid or substantially lessen impacts must be clearly identified and discussed. The ultimate outcome after mitigation shall also be discussed (i.e., significant but mitigated, significant and unmitigated). If other potentially significant issue areas arise during the detailed environmental investigation of the Project, consultation with Development Services Department is required to determine if these areas need to be added to the EIR. As supplementary information is required, the EIR may also need to be expanded.

Air Quality

Issue 1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Issue 2: Would the Project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Issue 3: Would the Project expose sensitive receptors to substantial pollutant concentrations?

An air quality study shall be prepared to discuss the Project's impact on the ability of the San Diego Air Basin (SDAB) to meet regional air quality strategies. The EIR section shall discuss the air quality study's findings, including both the potential stationary and non-stationary (i.e., vehicular) air emission sources associated with construction and operation of the proposed Project.

The section shall describe the Project's climatological setting within the SDAB and the SDAB's current attainment levels for State and Federal Ambient Air Quality Standards. The section shall include estimates of total-generated air pollutant emissions, a discussion of potential dust generation during construction, and proposed emissions reduction design features or dust suppression measures that would avoid or lessen emissions or dust-related impacts to sensitive receptors within the area. The section shall take into consideration the potential for criteria pollutant emissions generated from the Project, as well as toxic air contaminants. Proposed mitigation measures shall be identified, if applicable.

Biological Resources

- Issue 1: Would implementation of the proposed Project result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?**
- Issue 2: Would the proposed Project result in impacts to a sensitive habitat or sensitive natural community as identified in local, regional, state or federal plans, policies, or regulations?**
- Issue 3: Would the proposed Project result in an impact on City, State, or Federally regulated wetlands through direct removal, filling, hydrological interruption or other means?**
- Issue 4: Would the proposed Project result in interference with the movement of any native resident or migratory wildlife through linkages or wildlife corridors?**
- Issue 5: Would the Project conflict with provisions of adopted local habitat conservation plans or policies protecting biological resources?**
- Issue 6: Would the Project introduce land uses within or adjacent to the MHPA that would result in adverse edge effects?**
- Issue 7: Would the Project introduce invasive species into natural open space areas?**

A Biological Technical Report shall be prepared for the proposed Project and findings of the report shall be summarized in the EIR. The site is within and adjacent to the MHPA of the City's MSCP, and supports sensitive biological resources. The Project will impact sensitive biological resources and has the potential to result in direct, indirect, and/or cumulative impacts to biological resources within the MHPA. The EIR shall discuss the potential for significant direct or indirect impacts from the proposed Project to upland and wetland vegetation and sensitive species. Vegetation types shall be shown graphically. The EIR shall identify MSCP-covered and narrow endemic flora and fauna that exist or have a potential to exist in the area of the Project site. Wildlife corridors shall be identified, as well as conflicts with adopted plans and policies protecting biological resources, including the MSCP. In addition, the EIR shall quantify impacts to sensitive biological resources and identify appropriate mitigation measures.

Cultural Resources

Issue 1: Would the Project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site?

Issue 2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074?

Issue 3: Would the Project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

The results of the previous Historical Resource Technical Reports prepared for the two reservoirs to be demolished shall be summarized in the EIR.

An archaeological resources report shall be prepared to determine what, if any, significant archaeological resources and/or tribal cultural resources impacts would occur from the Project. The EIR section will discuss the findings of the report, including literature review, records search, Sacred Lands File search, Native American consultation, and archaeological surveys conducted for the proposed Project. The report shall also incorporate previous surveys from a cultural resources survey prepared previously for the Project in 2016 by Laguna Mountain Environmental. The historical resource technical reports and archaeological resources report shall be included as appendices to the EIR; the records search results should be provided under separate cover as a confidential appendix. If the potential exists to uncover subsurface resources or human remains during ground disturbing activity, associated mitigation measures shall be identified.

Energy

Issue 1: Would construction and operation of the Project result in the use of excessive amounts or electrical power?

Issue 2: Would the Project result in the use of excessive amounts of fuel or other forms of energy (including natural gas, oil, etc.)?

Appendix F of the State CEQA Guidelines requires that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. Particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy shall be included in this section. The EIR shall address the estimated energy use for the Project and assess whether the Project would generate a demand for energy (electricity and/or natural gas) that would exceed the planned capacity of the energy suppliers. This section shall utilize the energy data and assumptions compiled for the air quality impact analysis. A description of any energy and/or water saving Project features shall also be included in this section (with cross-references to the greenhouse gases [GHG] emissions discussion, as appropriate). This section shall describe any proposed

measures included as part of the Project that would conserve energy and reduce energy consumption, and shall address all applicable issues described within Appendix F of the CEQA Guidelines.

Geology and Soils

Issue 1: Would the Project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Issue 2: Would the Project result in a substantial increase in wind or water erosion of soils, either on or off the site?

Issue 3: Would the Project expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

The results of a geotechnical study prepared for the Project shall be summarized in the EIR. The EIR shall discuss the geologic and geotechnical conditions within the study area. The potential for either short- or long-term erosion impacts to soils on-site shall also be discussed. Geological constraints on the Project site, including groundshaking, ground failure, liquefaction, landslides, erosion, ground water, and geologic instability shall be addressed, as well as seismicity and seismic hazards created by faults present in the Project vicinity.

Greenhouse Gas Emissions

Issue 1: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Issue 2: Would the Project conflict with the City's Climate Action Plan (CAP) or another applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

This section shall present an overview of GHG emissions, including the most recent information regarding the current understanding of the mechanisms behind current conditions and trends, and the broad environmental issue related to global climate change. A discussion of current legislation, plans, policies, and programs pertinent to global climate change shall also be included. The EIR shall provide details of the Project's sustainable features that meet the criteria outlined in the Conservation Element of the General Plan.

The section shall discuss the proposed Project's consistency with the City's CAP, as analyzed through the preparation of a CAP Consistency Checklist (approved in July 2016; as amended in February 2017). The section shall provide explanation of how the Project would implement the required CAP measures.

Health and Safety

- Issue 1: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**
- Issue 2: 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 3: Would the Project expose people or structures to a significant risk of loss, injury, or death involving fire?**
- Issue 4: Would the Project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?**

The results of a lead abatement and hazardous materials investigation prepared for the Project shall be summarized in the EIR. The EIR shall discuss the potential hazards from construction and operation of the Project, including the potential for hazardous material release from routine use or from accident conditions.

The EIR shall include a description of potential hazards and hazardous materials issues that intersect or interface with the Project area, including disclosure of contamination sites compiled in accordance with Government Code Section 6596.25.

Fire hazards exist where highly flammable vegetation and/or litter is located adjacent to development. The EIR shall discuss the human and public safety impacts from the potential fire hazards within and adjacent to the Project.

In addition, the EIR shall discuss the potential for the Project's construction traffic and equipment to interfere with emergency plans in the area.

Hydrology/Water Quality

- Issue 1: Would the project result in a substantial increase in impervious surfaces and associated increased runoff?**
- Issue 2: Would the Project result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?**
- Issue 3: Would the Project result in an increase in pollutant discharge to receiving waters during or following construction, or discharge identified pollutants to an already impaired water body?**

Issue 4: What short-term and long-term effects would the Project have on local and regional water quality, and 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?

Hydrology deals with the properties, distribution, and circulation of surface water, groundwater, and atmospheric water. The quantity of water which flows in a creek or river is calculated based on historic climatic conditions combined with the watershed characteristics. The slope and shape of the watershed, soil properties, recharge area, and relief features are all watershed characteristics, which influence the quantity of surface flows. Therefore, as land is developed, impervious area is increased, thereby increasing runoff.

The EIR shall evaluate if the proposed Project would have a potential for increasing runoff rates and volumes within the proposed Project area. The discussion shall incorporate findings from the hydrology study prepared for the Project, consistent with City drainage design standards and in accordance with the San Diego County Hydrology Manual. Anticipated changes to existing drainage patterns, as well as runoff rates and volumes, in the proposed Project area shall be addressed in the EIR. A preliminary hydrology and hydraulics study shall be provided and measures to protect on-site and downstream properties from increased runoff, erosion, or siltation must be identified. The EIR shall address the potential for Project implementation to impact the hydrologic conditions within and downstream of the Project area.

Water Quality is affected by sedimentation caused by erosion, by urban run-off carrying contaminants, and by direct discharge of pollutants (point-source pollution). As land is developed or redeveloped, the impervious surfaces could send an increased volume of runoff containing oils, heavy metals, pesticides, fertilizers, and other contaminants (non-source pollution) into associated watersheds. Sedimentation can impede stream flow. Degradation of water quality could impact human health as well as wildlife systems. Sedimentation can cause impediments to stream flow. In addition, oxygen availability is affected by sedimentation, which can significantly influence aquatic and riparian habitats. Compliance with the City's Storm Water Standards is generally considered to preclude water quality impacts. The Storm Water Standards are available online.

The Project's effect on water quality within the Project area and downstream shall be discussed. Discussion of runoff treatment shall be included, including via structural best management practices (BMPs). Discussion of the BMPs conformance with treatment control and flow control requirements based on the BMP Design Manual (BMPDM) shall be included.

Land Use

Issue 1: Would the Project result in an inconsistency/conflict with the environmental goals, objectives, or guidelines of the General/Community Plan in which it is located?

The Project site is designated "Parks, Open Space" in the LJCP and an SDP is required because the Project may have significant impacts on environmentally sensitive lands. A CDP is required because the Project proposes development within the Coastal Overlay Zone.

This section shall provide a discussion of all applicable land use plans to establish a context in which the Project is being proposed. Specifically, it shall discuss the Project's consistency with the environmental goals, objectives, and recommendations set forth in applicable City land use regulations and policies including the General Plan (including all applicable elements), the LJCP, and Land Development Code. If the Project is found to be inconsistent with any adopted land use plans, the EIR shall disclose this information if the inconsistency would result in potentially significant physical impacts. The land use compatibility discussion will focus on the compatibility of the Project with surrounding uses, particularly La Jolla Natural Park.

Noise

Issue 1: Would the Project result in the exposure of people to noise levels created by the Project which exceed the City's adopted noise ordinance and/or the City's Significance Determination Thresholds?

Issue 2: Would the Project result in or create a significant permanent increase in the existing ambient noise levels?

Issue 3: Would the Project result in the exposure of persons to or generation of excessive ground-borne vibration levels?

An acoustical analysis, in accordance with the City's "Acoustical Report Guidelines," shall be prepared to determine what, if any, significant noise impacts would occur due to Project construction and operation.

The analysis shall discuss how Project would conform to the City of San Diego Municipal Code Noise and Abatement Control Ordinance §59.5.01 and the General Plan. This includes analysis that shall analyze noise impacts from construction activities to the surrounding residences, including demolition, excavation, construction, and materials handling at the reservoir sites, existing roadways, planned roadways, and planned stockpile areas. If significant impacts are identified, barriers shall be identified to reduce impacts. An analysis of potential vibration impacts during construction shall also be provided. In addition, construction traffic noise may impact surrounding uses and the EIR shall include a discussion regarding this potential impact.

Analysis of the Project's operational noise shall be included, including potential noise from the pressure reduction valve, vault noise, water splash noise for tank fill, and typical recirculation pump noise, if applicable.

Paleontological Resources

Issue 1: Would the Project require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit, or over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

The EIR shall include a paleontological resources discussion that identifies the underlying formation(s) and the likelihood of uncovering paleontological resources during grading activities. The EIR shall identify the depth of cut (in feet) and amount of grading (in cubic yards) that would result from any grading activities. The City's thresholds for monitoring include grading depths of 10 feet or more and excavation of 1,000 or 2,000 cubic yards depending on the respective moderate or high sensitivity of the formational soils on-site. If the proposed construction would impact fossil formations possessing moderate to high potential for significant resources, specific conditions (monitoring and curation) would be required to mitigate impacts to a level below significance. This analysis shall be based on information in the geotechnical study to be provided by the City, information regarding planned additional excavation depths, and the City's guidelines regarding paleontological sensitivity.

Transportation/Circulation

Issue 1: Would the Project result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system?

Issue 2: Would the Project have a substantial impact upon existing or planned transportation systems?

Issue 3: Would the Project result in an increase in traffic hazards for motor vehicles, bicyclists, or pedestrians due to a proposed, non-standard design feature (e.g., poor sight distance or driveway onto an access-restricted roadway)?

Issue 4: Would the Project result in a conflict with adopted policies, plans, or programs supporting alternative transportation modes (e.g., bus turnouts, bicycle racks)?

A traffic/mobility study shall be prepared to determine what, if any, significant traffic impacts would occur from the Project due to Project construction and operation. Construction trip generation estimates shall include the projected number of construction truck trips (materials/equipment delivery and waste hauling) and construction worker trips that will access the Project site during the AM and PM peak hours. Roadway segments and intersections shall be analyzed for construction impacts under four scenarios: existing conditions, existing plus construction traffic conditions, cumulative (year 2020), and cumulative plus construction traffic conditions. Traffic hazards and conflicts with alternative

modes of transportation from project construction shall also be analyzed. If potentially significant impacts are identified, the EIR shall present mitigation measures to reduce such impacts below a level of significance.

Utilities and Service Systems

Issue 1: Would the Project result in a need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts with regard to solid waste disposal?

The results of a Waste Management Plan (WMP) prepared for the Project shall be summarized in the EIR. The EIR shall describe the potential waste generation impacts that may result from the Project. The EIR shall summarize the calculations of waste generation and anticipated recycling and reuse opportunities to assess whether the Project would individually or cumulatively exceed the levels specified in the City's CEQA Significance Determination Thresholds (July 2016) for Solid Waste.

Visual Quality and Neighborhood Character

Issue 1: Would implementation of the Project result in substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

Issue 2: Would the Project create a negative aesthetic site or project?

Issue 3: Would the Project's bulk, scale, materials, or style be incompatible with surrounding development?

Issue 4: Would the Project result in substantial alteration to the existing or planned character of the area?

Issue 5: Would the Project result in a substantial change in the existing landform?

Issue 6: Would the Project result in substantial light or glare which would adversely affect daytime or nighttime views in the area?

The EIR shall provide an evaluation of the visual quality/neighborhood character changes due to the proposed Project, including an evaluation of consistency with policies protecting scenic resources in the Project vicinity. The analysis shall address how Project development will appear to viewers from surrounding public roadways, neighborhoods, the La Jolla Natural Park, and public viewing areas.

This section of the EIR shall include a description and analysis of the landform modification that would result from construction of the Project, focusing on the grading associated with the new reservoir site and soil stockpile location. The EIR shall also analyze the use of materials that could emit or reflect a significant amount of light or glare, including lighting

from nighttime construction. Visual simulations of the Project shall be incorporated into the EIR section.

X. SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

This section shall discuss the significant unavoidable impacts of the Project, including those significant impacts that can be mitigated but not reduced to below a level of significance. Discuss impacts that cannot be reduced to below a level of significance in spite of the applicant's willingness to implement all feasible mitigation measures. Please do not include analysis. State which impacts (if any) cannot be alleviated without imposing an alternative design or location. In such cases, describe why the Project has been proposed in spite of the probable significant effects. See CEQA Guidelines Section 15126.2(b).

XI. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In accordance with CEQA Guidelines Section 15126.2(c), the EIR shall include a discussion of any significant irreversible environmental changes which would be caused by the action should it be implemented. This section shall address the use of nonrenewable resources during the construction and life of the Project. See CEQA Guidelines Section 15127 for limitations on the requirements for this discussion.

XII. GROWTH INDUCEMENT

The EIR shall address the potential for growth inducement through implementation of the Project. The EIR shall discuss the ways in which the Project (1) is directly and indirectly growth inducing (i.e., fostering economic or population growth by land use changes, construction of additional housing, etc.); and (2) if the subsequent consequences (i.e., impacts to existing infrastructure, requirement of new facilities, roadways, etc.) of the growth inducing Project would create a significant and/or unavoidable impact, and provide for mitigation or avoidance. Accelerated growth could further strain existing community facilities or encourage activities that could significantly affect the environment. This section need not conclude that growth-inducing impacts (if any) are significant unless the Project would induce substantial growth or concentration of population.

XIII. CUMULATIVE IMPACTS

In accordance with CEQA Guidelines Section 15130, potential cumulative impacts shall be discussed in a separate section of the EIR. This section shall include existing and pending development proposals within the Project area, including those undergoing review with the Development Services Department, as well as recent past and reasonably foreseeable future developments and redevelopments in the community. The discussion shall address the potential cumulative effects related to each environmental resources area that should be discussed in the EIR as outlined above.

The EIR shall summarize the overall short-term and long-term impacts this Project could have in relation to other planned and proposed projects. When this Project is considered with other past, present, and reasonably foreseeable probable future projects within close proximity, address whether the Project would result in significant environmental changes that are individually limited but cumulatively considerable. If incremental impacts do not rise to the level of cumulatively significant, the Draft EIR shall make a statement to that effect.

XIV. EFFECTS FOUND NOT TO BE SIGNIFICANT

A separate section of the EIR shall include a brief discussion of why certain areas were not considered to be potentially significant and were therefore not included in the EIR. For the proposed Project, these include agricultural and forestry resources, mineral resources, population and housing, public services, recreation, and utilities other than landfill services. If issues related to these areas or other potentially significant issues areas arise during the detailed environmental investigation of the Project, consultation with the Environmental Analysis Section (EAS) of the Land Development Review Division is recommended to determine if subsequent issue area discussions need to be added to the EIR. Additionally, as supplementary information is submitted (such as with the technical reports), the EIR may need to be expanded to include these or other additional areas.

XV. ALTERNATIVES

The EIR shall place major attention on reasonable alternatives that avoid or reduce the Project's significant environmental impacts while still achieving the stated Project objectives. Therefore, a discussion of the Project's objectives shall be included in this section. The alternatives shall be identified and discussed in detail and shall address all significant impacts. Refer to Section 15364 of the CEQA Guidelines for the CEQA definition of "feasible."

This section shall provide a meaningful evaluation, analysis, and comparison of alternatives' impacts to those of the Project (matrix format recommended). These alternatives shall be identified and discussed in detail and shall address all significant impacts. The alternatives analysis shall be conducted with sufficient graphics, narrative, and detail to clearly assess the relative level of impacts and feasibility. Issues to consider when assessing "feasibility" are site suitability, economic viability, availability of infrastructure, General Plan consistency, other regulatory limitations, jurisdictional boundaries and the applicant's control over alternative sites (own, ability to purchase, etc.). The advantages and disadvantages of each alternative will be compared to the proposed Project and reasons for rejecting or recommending the alternative will be discussed in the EIR.

Preceding the detailed alternatives analysis, provide a section entitled "Alternatives Considered but Rejected." This section shall include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reasons for rejection must be explained in detail and demonstrated to the public the analytical route followed in rejecting certain alternatives.

No Project Alternative

The No Project Alternative discussion shall compare the environmental effects of approving the Project with impacts of not approving the Project. In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative shall discuss the existing conditions at the time of the NOP, as well as what would be reasonably expected to occur in the foreseeable future if the proposed Project is not approved, based on current zoning, land use designations, and available infrastructure. The No Project Alternative assumes no construction associated with the proposed Project. The intent of this alternative is to satisfy CEQA's requirement to address development in accordance with any approved plans or existing zoning.

Other Project Alternatives

In addition to a No Project Alternative, the EIR shall consider other alternatives that are determined through the environmental review process that would mitigate potentially significant environmental impacts. These alternatives must be discussed and/or defined with EAS staff prior to including them in the EIR.

The Alternatives section of the EIR shall be based on a description of "reasonable" Project alternatives, which reduce or avoid potentially significant impacts associated with the proposed Project. Site-specific alternatives, if needed, shall be developed in response to the findings of the environmental analyses and the various technical studies and may include a change in one or more aspects of the scope of the Project and/or associated construction activities to mitigate one or more of the identified significant adverse impacts of the proposed Project.

If, through the environmental analysis, other alternatives become apparent that would mitigate potential impacts, these shall be discussed with EAS staff prior to including them in the Draft EIR. It is important to emphasize that the alternatives section of the EIR shall constitute a major part of the report. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternative analysis.

XVI. MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

Mitigation measures shall be clearly identified and discussed and their effectiveness assessed in each issue section of the EIR. A Mitigation, Monitoring, and Reporting Program (MMRP) for each issue area with significant impacts is mandatory and projected effectiveness must be assessed (i.e., all or some CEQA impacts would be reduced to below a level of significance, etc.). At a minimum, the MMRP shall identify: (1) the department responsible for the monitoring; (2) the monitoring and reporting schedule; and (3) the completion requirements. In addition, mitigation measures and the monitoring and reporting program for each impact shall also be contained (verbatim) to be included within the EIR in a separate section and a duplicate separate copy (Word version) must also be provided to EAS.

XVII. REFERENCES

Material must be reasonably accessible. Use the most up-to-date possible and reference source documents.

XVIII. INDIVIDUALS AND AGENCIES CONSULTED

List those consulted in preparation of the EIR. Seek out parties who would normally be expected to be a responsible agency or have an interest in the Project.

XIX. CERTIFICATION PAGE

Include City and consulting staff members, titles, and affiliations.

XX. APPENDICES

Include the NOP, scoping meeting transcript, and comments received regarding the NOP and Scoping Letter. Include all accepted technical studies.

CONCLUSION

If other potentially significant issue areas arise during detailed environmental investigation of the Project, consultation with EAS staff is required to determine if these other areas need to be addressed in the EIR. Should the Project description be revised, an additional scope of work may be required. Furthermore, as the Project design progresses and supplementary information becomes available, the EIR may need to be expanded to include additional issue areas.

It is important to note that timely processing of your Project will be contingent in large part on your selection of a well-qualified consultant. Prior to starting work on the EIR, a meeting between the consultant and EAS will be required to discuss and clarify the scope of work. Until the screencheck for the Draft EIR is submitted, which addresses all of the above issues, the environmental processing timeline will be held in abeyance. Should you have any questions regarding this letter or the environmental process, please contact the environmental analyst, Mark Brunette at (619) 446-5379; for general questions regarding Project processing and/or the Project, contact Angela Nazareno, Project Manager at (619) 446-5277.

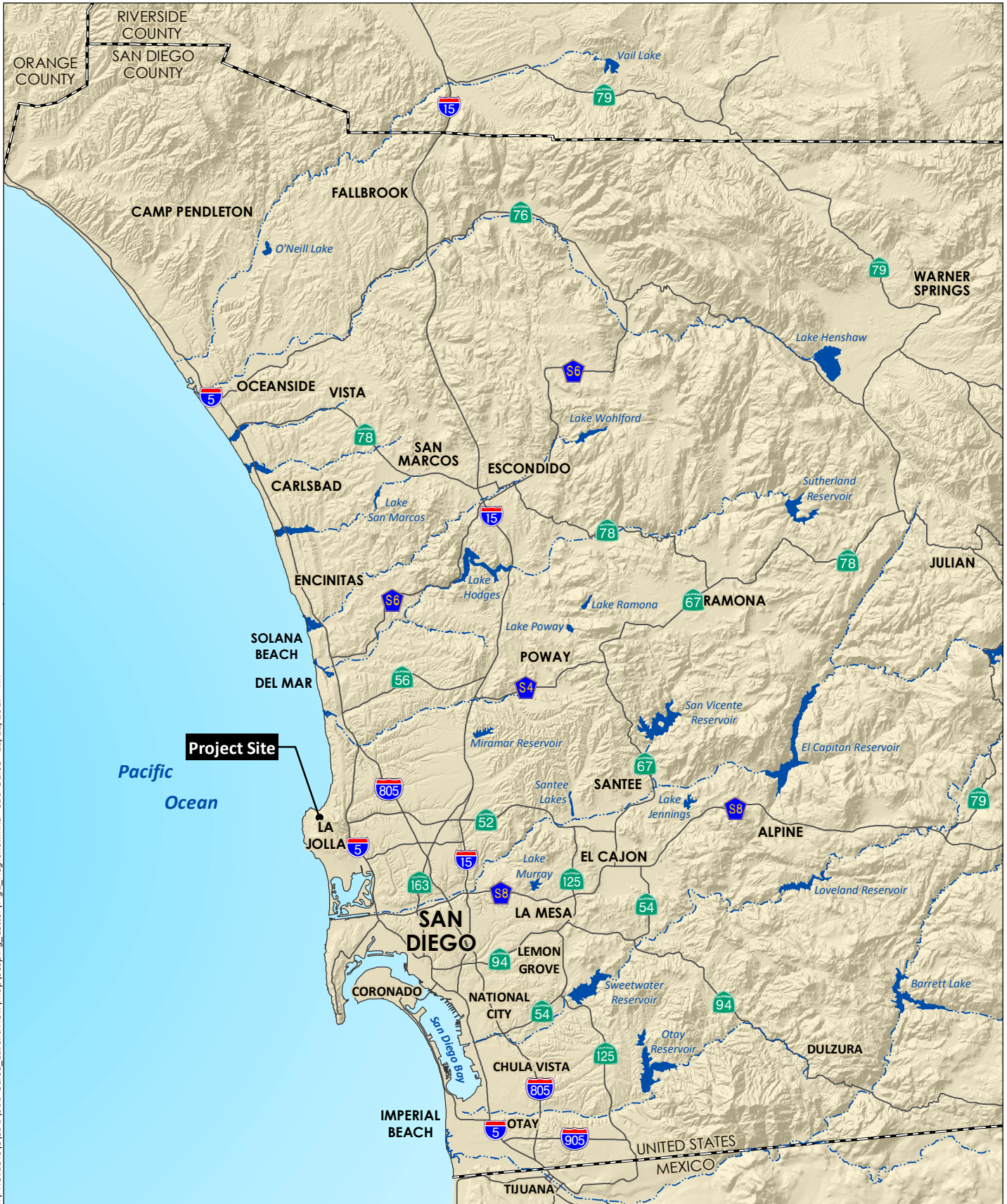
Sincerely,

Kerry M. Santoro
Deputy Director
Development Services Department

Attachments: Figure 1 – Regional Location Map
Figure 2 – Aerial Vicinity Map
Figure 3 – Site Plan

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Mr. Ed Fordan
April 5, 2018

cc: Mark Brunette, Land Development Review Division
Angela Nazareno, Project Management Division
Andrea Bitterling, HELIX Environmental Planning, Inc., Consultant



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Source: Base Map Layers (SanGIS, 2016)



Regional Location

Figure 1



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Source: Aerial (SanGIS 2014)

Aerial Vicinity

Figure 2



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Source: IEC 2017