



THE CITY OF SAN DIEGO

## MITIGATED NEGATIVE DECLARATION

Project No. 527644

SCH No. N/A

**SUBJECT: 9775 Towne Centre Drive:** A request for a COMMUNITY PLAN AMENDMENT to transfer 7,635 square feet from Subarea 11 (Planned Industrial Permit 96-7756) to Subarea 12 and to increase the overall development intensity by 46,122 square feet; a PLANNED DEVELOPMENT PERMIT to amend Planned Industrial Development (PID) Permit No. 90-0892 to transfer approximately 18,878 square feet from lots 3A, 3B, and 3D to lot 6A of Subarea 12 to increase the allowable development intensity and amend PID No. 96-7756 to reduce the existing 200,000-square-foot allocation of trip generating space to reflect a total allocation of 192,365 square feet of trip generating space and 7,370 square feet of non-trip generating covered courtyard area; and a SITE DEVELOPMENT PERMIT for development within the Community Plan Implementation Overlay Zone-A.

The existing 103,800-square-foot scientific research building and associated existing hardscape, landscaping, and utilities would be demolished and an approximately 173,930-square-foot structure with two levels of subterranean parking would be constructed. The 173,930 square feet includes 156,500 square feet of trip generating scientific research space, 8,500 square feet of accessory use space, and an 8,930-square-foot rooftop mechanical penthouse that does not count towards the Floor Area Ratio (FAR). Additionally, the project would include construction of surface parking areas, pedestrian hardscape, landscaping, retaining walls, infrastructure (e.g., water, sewer), and site access. The developed, approximately 12.11-acre project site is located at 9775 Towne Centre Drive. The site is designated Scientific Research within Subarea 12 and zoned IP-1-1 (Industrial Park) within the University Community Plan. In addition, the project site is within the Airport Land Use Compatibility Overlay Zone (Marine Corps Air Station [MCAS] Miramar), Airport Land Use Compatibility Plan Noise Contours (60 to 65 Community Noise Equivalent Level), Airport Influence Area (Review Area 1), Airport Environs Overlay Zone, Federal Aviation Administration Part 77 Noticing Area (Miramar), Airport Safety Zone MCAS Miramar (Accident Potential Zone 2/ Transition Zone), Community Plan Implementation Overlay Zone (CPIOZ-A), Very High Fire Severity Zone, Parking Impact Overlay Zone (Campus), and the Prime Industrial Lands. (LEGAL DESCRIPTION: Parcel 1 of Parcel Map No. 15937). APPLICANT: BMR-APEX LP.



**I. PROJECT DESCRIPTION:**

See attached Initial Study.

**II. ENVIRONMENTAL SETTING:**

See attached Initial Study.

**III. DETERMINATION:**

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

**IV. DOCUMENTATION:**

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

**V. MITIGATION, MONITORING AND REPORTING PROGRAM:**

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

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the Mitigation Monitoring and Reporting Program (MMRP) requirements are incorporated into the design.
2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "**ENVIRONMENTAL/MITIGATION REQUIREMENTS.**"
3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:  
  
<http://www.sandiego.gov/development-services/industry/standtemp.shtml>
4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private



Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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

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

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

**CONTACT INFORMATION:**

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division 858-627-3200**.
  - b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360**.
2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) Number 527644 and/or Environmental Document Number 527644, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.).

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

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



shall include copies of permits, letters of resolution or other documentation issued by the responsible agency: **Not Applicable**

4. **MONITORING EXHIBITS:** All consultants are required to submit to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

**Note: Surety and Cost Recovery – When deemed necessary by the DSD Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.**

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

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

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

#### PALEONTOLOGICAL RESOURCES

##### **I. Prior to Permit Issuance**

##### **A. Entitlements Plan Check**

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans, but prior to the first precon meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that



the requirements for paleontological monitoring have been noted on the appropriate construction documents.

*B. Letters of Qualification have been submitted to ADD*

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

**II. Prior to Start of Construction**

*A. Verification of Records Search*

1. The PI shall provide verification to MMC that a site-specific records search has been completed. Verification must include at a minimum a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

*B. PI Shall Attend Precon Meetings*

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a precon meeting that shall include the PI, Construction Manager (CM), and/or Grading Contractor, RE, Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related precon meetings to make comments and/or suggestions concerning the paleontological monitoring program with the CM and/or Grading Contractor.
  - a. If the PI is unable to attend the precon meeting, the Applicant shall schedule a focused precon meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored—Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
  - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.



- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

### **III. During Construction**

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

1. The monitor shall be present full time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The CM is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the PME.
2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
3. The monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSVs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

#### **B. Discovery Notification Process**

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

#### **C. Determination of Significance**

1. The PI shall evaluate the significance of the resource.
  - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional action is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
  - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground



disturbing activities in the area of discovery will be allowed to resume.

- c. If resource is not significant (e.g., small pieces of broken common 3 fragments or other scattered common fossils), the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
- d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

#### **IV. Night and/or Weekend Work**

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

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

##### **B. *If night work becomes necessary during the course of construction***

- 1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
- 2. The RE, or BI, as appropriate, shall notify MMC immediately.

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

#### **V. Post Construction**

##### **A. *Preparation and Submittal of Draft Monitoring Report***

- 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the paleontological monitoring program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.
  - a. For significant paleontological resources encountered during monitoring, the paleontological recovery program shall be included in the Draft Monitoring Report.



- b. Recording Sites with the San Diego Natural History Museum - The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the paleontological monitoring program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.
  2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
  3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
  4. MMC shall provide written verification to the PI of the approved report.
  5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Fossil Remains*
1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
  2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
- C. Curation of fossil remains: Deed of Gift and Acceptance Verification*
1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
  2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
- D. Final Monitoring Report(s)*
1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
  2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

VI. PUBLIC REVIEW DISTRIBUTION:

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

CITY OF SAN DIEGO  
 Mayor's Office (91)  
 Councilmember Bry, District 1 (MS 10A)  
 Development Services Department  
     EAS  
     Planning Review  
     Landscape  
     Engineering  
     Transportation Development



Geology  
Fire-Plan Review  
PUD – Water & Sewer  
DPM  
Planning Department  
Plan-Long Range Planning  
Plan-Facilities Financing  
Library Department - Government Documents (81)  
Central Library (81A)  
University City Community Branch Library (81JJ)  
North University Branch Library (81KK)  
Environmental Services Department (93A)  
City Attorney's Office (93C)

OTHER ORGANIZATIONS, GROUPS AND INTERESTED INDIVIDUALS

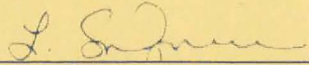
San Diego Natural History Museum (166)  
Lisa Cumper  
Clint Linton  
University City Community Planning Group (480)  
Editor, The Guardian UCSD (481)  
Commanding General, MCAS Miramar Air Station (484)  
Deron Bear Chairman, Marian Bear Natural Park Recreation Council (485)  
University City Community Association (486)  
Debbie Knight (487)  
University City Library (488)

VII. RESULTS OF PUBLIC REVIEW:

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



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



E. Shearer-Nguyen  
Senior Planner  
Development Services Department

April 10, 2018  
Date of Draft Report

May 14, 2018  
Date of Final Report

Analyst: Morgan Dresser

Attachments: Initial Study Checklist  
Figure 1: Regional Location  
Figure 2: Project Location on Aerial Photograph  
Figure 3: Proposed Site Plan



## INITIAL STUDY CHECKLIST

1. Project title/Project number: 9775 Towne Centre Drive / 527644
2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California, 92101
3. Contact person and phone number: Morgan Dresser / (619) 446-5404
4. Project location: 9775 Towne Centre Drive, San Diego, California 92121 (Assessor's Parcel Number 343-121-14). Refer to Figures 1 and 2.
5. Project Applicant/Sponsor's name and address: BMR-APEX LP, 17190 Bernardo Center Drive, San Diego, CA 92128
6. General/Community Plan designation: Industrial Employment/Industrial – Scientific Research
7. Zoning: IP-1-1 (Industrial Park)
8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

A request for a COMMUNITY PLAN AMENDMENT to transfer 7,635 square feet from Subarea 11 (Planned Industrial Permit 96-7756) to Subarea 12 and to increase the overall development intensity by 46,122 square feet; a PLANNED DEVELOPMENT PERMIT to amend Planned Industrial Development (PID) Permit No. 90-0892 to transfer approximately 18,878 square feet from lots 3A, 3B, and 3D to lot 6A of Subarea 12 to increase the allowable development intensity and amend PID No. 96-7756 to reduce the existing 200,000-square-foot allocation of trip generating space to reflect a total allocation of 192,365 square feet of trip generating space and 7,370 square feet of non-trip generating covered courtyard area; and a SITE DEVELOPMENT PERMIT for development within the Community Plan Implementation Overlay Zone-A.

The existing 103,800-square-foot scientific research building and associated existing hardscape, landscaping, and utilities would be demolished and an approximately 173,930-square-foot structure with two levels of subterranean parking would be constructed. The 173,930 square feet includes 156,500 square feet of trip generating scientific research space, 8,500 square feet of accessory use space, and an 8,930-square-foot rooftop mechanical penthouse that does not count towards the FAR.

The project site was originally identified as Lot 6 of Planned Industrial Development Permit 88-0076 with an allocation of 164,500 FAR. In 1990, this Planned Industrial Development Permit was amended by Planned Industrial Development Permit 90-0892 which resulted in Lot 6 being split into Lots 6a and 6b. Lot 6a (the project site) was allocated 100,000 FAR, while Lot 6b was allocated the remaining 64,500 FAR. The 103,800-square-foot scientific research building existed on the project site at that time. Thus, only the 100,000-square-foot



allocation associated with Lot 6a is being considered in the required FAR allocations for the project.

The project proposes a 65,000 FAR increase over the existing 100,000 square feet of allocated FAR, for a total of 165,000 FAR. Of the proposed 65,000 FAR increase, 8,500 square feet is non-trip generating accessory use space (but subject to FAR requirements); thus, density transfers for the 8,500 square feet are not required. Accessory space, as defined by the University Community Plan is amenity space intended to serve users within the project site and adjacent sites. Therefore, density transfers are required for 56,500 square feet of Scientific Research space. The proposed Planned Development Permit would allow for the transfer of 18,878 square feet from lots within the existing Planned Industrial Development (from 4535, 4545, and 4550 Towne Centre Court). A Community Plan amendment would transfer an additional 7,635 square feet from Subarea 12 to Subarea 11, outside of the Planned Industrial Development (from Planned Industrial Development Permit 96-7756 at 9855, 9865, 9875, 9879, and 9885 Towne Centre Drive), through an amendment to Table 3 in the University Community Plan. The remaining square footage difference would be 29,987 square feet of FAR, which would represent new square footage added to the subarea. In addition to transfers, the project would implement Transportation Demand Management (TDM) measures targeting a reduction in project trips during peak hours. For additional details on the proposed square footage transfers, refer to Section XVI, Transportation/Traffic of this Initial Study Checklist.

Figure 3 depicts the project site plan. The structure would be surrounded by parking/hardscape and landscaping. Pedestrian paths would be installed to provide access between the structure, parking areas, and Towne Centre Drive. Pedestrian access to Towne Centre Drive would be fully separated from, but adjacent, to the vehicular access driveway. New retaining walls and/or extensions of existing retaining walls are proposed along the northwestern, eastern, and southwestern project boundaries. A new refuse and recycling area would be located in level one of the parking garage, adjacent to the proposed loading docks. All landscaping, brush management, and irrigation would conform to the requirements of the City of San Diego (City) Landscape Regulations (San Diego Municipal Code) the Land Development Manual, and the Landscape Standards.

Vehicular driveway access to the project site would continue to occur along Towne Centre Drive but would be relocated to the south approximately 155 feet, to the southern half of the project frontage. A 25-foot-wide fire access driveway and 26-foot fire access lane would be accommodated on-site surrounding the proposed scientific research facility. The project would provide a total of 495 parking spaces including approximately 175 on-grade spaces and approximately 320 below-ground parking garage spaces, and would contain 486 standard spaces and 9 accessible spaces. Forty of the parking spaces would be for exclusive use of zero emission or carpool vehicles, and 30 of those spaces would be equipped with electric vehicle charging capabilities (e.g., appropriate wiring and infrastructure to allow future installation of electric vehicle charging stations). Fifteen of the electric vehicle spaces would be installed with facilities and ready for use and 2 of those spaces would be equipped with quick-charging equipment. Eight spaces would be provided for motorcycles, and a total of 25 short-term plus 25 long-term bicycle spaces would be provided.



The existing on-site water, storm water, and sewer lines would be modified to allow for compatibility with the design of the new facility. All utility lines would be constructed so as to allow for a connection with the existing utility lines located under Towne Centre Drive.

Proposed grading activities would disturb a total of 4.75 acres, or approximately 39 percent of the project site. Grading would consist of approximately 75,000 cubic yards of cut and 29,000 cubic yards of fill, resulting in export of 46,000 cubic yards. Grading cuts would extend to a depth of approximately 25 feet, and fills would be a maximum of 13 feet. All excavated material would be exported to a legal disposal site.

9. Surrounding land uses and setting:

The developed, approximately 12.11-acre project site is located at 9775 Towne Centre Drive. The project site is bound by Towne Centre Drive to the west, existing scientific research developments to the north and south, and railroad tracks to the east at the bottom of a steep slope. Currently, an existing three-story structure is located in the center of the property surrounded by surface, asphalt concrete parking areas and non-native landscaping. Access to the parcel is on the western corner. Slopes on the east side of the project site are mapped as Multi-Habitat Planning Area and descend towards the railroad tracks, Carroll Canyon Road and Interstate 805 (I-805), and adjacent office park development.

The site is designated Scientific Research within Subarea 12 of the University Community Plan and zoned IP-1-1 (Industrial Park). In addition, the project site is within the Airport Land Use Compatibility Overlay Zone (MCAS Miramar), Airport Influence Area (MCAS Miramar Review Area 1), Airport Land Use Compatibility Plan Noise Contours (60 to 65 Community Noise Equivalent Level [CNEL]), Airport Safety Zone (MCAS Miramar – Accident Potential Zone 2/Transition Zone), Federal Aviation Administration (FAA) Part 77 Notification Area (MCAS Miramar), Community Plan Implementation Overlay Zone – Type A (CPIOZ-A), Very High Fire Hazard Severity Zone, Parking Impact Overlay Zone (Campus Impact Area), and Prime Industrial Lands.

The existing land uses within the vicinity include commercial/industrial/office space to the north, west, and south, and open space areas to the east. The closest residential area is approximately one-quarter mile to the south of the project site. Surrounding land use designations as identified on the University Community Plan Land Use Map consists of Industrial Employment and Park, Open Space, and Recreation. In addition, the project site is located in a developed area currently served by existing public services and utilities.

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

None

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

In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego notified the Lipay Nation of Santa Isabel and the Jamul Indian Village, both traditionally



and culturally affiliated with the project area, of the project. These tribes were notified via email on July 7, 2017. Both Native American Tribes responded within the 30-day formal notification period requesting consultation. Consultation took place on August 11, 2017.

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



**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**DETERMINATION: (To be completed by Lead Agency)**

On the basis of this initial evaluation:

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

## EVALUATION OF ENVIRONMENTAL IMPACTS:

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



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

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

The University Community Plan does not identify any designated public view corridors or scenic vistas within the boundaries of the project site; nor is it located within an area that would impede a public view, as identified by the University Community Plan, which typically associates public views with visual access to open space areas from public roadways. Additionally, no scenic vistas have been identified within the surrounding area. Thus, there would be no impact to scenic vistas.

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

The closest state highway to the project site is I-805. This highway is not a designated state scenic highway per the Department of Transportation (Caltrans) State Scenic Highway Program. Therefore, the project would not damage scenic resources within a state scenic highway, and no impact would occur.

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

The project would not substantially degrade the existing visual character or quality of the project site because the existing building would be demolished and replaced with a new four-story structure with updated architectural design and landscaping that complies with current City standards. The project site is visible from Towne Centre Drive, Carroll Canyon Road, Sorrento Valley Road, and I-805. Although the new structure would be taller than the existing building by approximately 20 feet, the proposed structure would be similar in scale and height as existing surrounding developments. The majority of the parking would be located in a below-grade parking structure, while the surface parking would be surrounded by landscaping consistent with City Landscape regulations. The project would retain 5 existing trees (including an existing Torrey Pine tree) and would plant 9 new trees along Towne Centre Drive, which would provide screening of the project as viewed from the roadway. In addition, the existing scrub oak trees along the eastern property line, visible from I-805, would remain and would shield views of the proposed structure from I-805 and Carrol Canyon Road.

Three retaining walls are proposed within the project site. Wall 1 would run along the northwestern project boundary for 245 feet (ranging from one foot to six feet tall) with landscaping installed to screen this wall from the adjacent property. Wall 2 would run northwest from the eastern corner of the site for approximately 150 feet (ranging from two feet to nine feet at its maximum height) and would not be visible from the project site, as it would sit at-grade along the eastern boundary edge. In addition, this wall would be shielded by existing vegetation sitting atop the east-facing slope, which would shield the wall from viewpoints to the east of site, including from I-805. Wall 3 would run along the southwest edge of the project site from the southeast corner of the site to the northeast corner for approximately 370 feet (ranging from three and a half feet tall to five feet tall at its maximum height) and would sit below the existing grade of the adjacent property. In addition,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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the area between the retaining wall and the adjacent property would preserve the existing eucalyptus trees.

Overall, the project would be similar to existing surrounding developments. As such, the project would not substantially degrade the existing visual character or quality of the site or its surroundings. Therefore impacts would be less than significant.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project site is currently developed with an existing scientific research facility and parking lots/hardscape. The demolition of the existing building and the subsequent construction of a new scientific research building would not create a new significant source of light as compared to the existing condition. The project would comply with the outdoor lighting standards contained in Municipal Code Section 142.0740 (Outdoor Lighting Regulations) that require all outdoor lighting be installed, shielded, and adjusted so that the light is directed in a manner that minimizes negative impacts from light pollution, including trespass, glare, and to control light from falling onto surrounding properties. Therefore, lighting installed with the project would not adversely affect day or nighttime views in the area. Additionally, the project would not introduce a source of glare that could affect day or nighttime views. In order to avoid such glare impacts, exterior materials utilized for proposed structures would be limited to specific reflectivity ratings as required per Municipal Code Section 142.0730 (Glare Regulations). Thus, impacts would be less than significant.

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

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

Based on the most recent Department of Conservation Farmland Mapping and Monitoring Program (FMMP) map, the project site is classified as Urban and Built Up Land. As such, the project would not convert Farmland to a non-agricultural use, resulting in no impact.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is zoned Industrial Park (IP-1-1) and designated Scientific Research per the University Community Plan. The project site is not under a Williamson Act Contract. Therefore, the project



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would not conflict with existing zoning for agricultural use or a Williamson Act Contract, resulting in no impact.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is zoned Industrial Park (IP-1-1) and designated Scientific Research per the University Community Plan. The project site is not within an area zoned as forest land, timberland, or for timberland production, resulting in no impact.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site contains existing industrial development and does not contain any forest land as defined by Public Resources Code Section 12220(g). Therefore, the project would not result in the loss of forest land or convert forest land to non-forest use, resulting in no impact.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is classified as Urban and Built Up Land on the most recent FMMP map, does not contain any forest land as defined by Public Resources Code Section 12220(g), and does not contain any active agricultural operations. The existing environment surrounding the project site includes industrial office space development, open space/conservation lands, and public facilities including major roadways. There are no active agricultural operations or forestland within the vicinity of the project site; therefore, the project would not result in the conversion of farmland to a non-agricultural use or convert forestland to a non-forest use, resulting in no impact.

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

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The San Diego Air Pollution Control District (SDAPCD) is the agency that regulates air quality in the San Diego Air Basin, in which the project site is located. The SDAPCD prepared the Regional Air Quality Strategy (RAQS) in response to the requirements set forth in the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA). As such, the RAQS is the applicable regional air quality plan

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that sets forth the SDAPCD's strategies for achieving the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS).

The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by the San Diego Association of Governments (SANDAG) in the development of the regional transportation plan and sustainable communities strategy. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the general plan would not conflict with the RAQS. In the event that a project would propose development that would generate less traffic, population, or employment than anticipated by growth projections, the project would likewise be consistent with the RAQS because it would be anticipated to reduce air emissions. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS.

The project site is designated Industrial-Scientific Research per the City's General Plan and Industrial-Scientific Research per the University Community Plan (UCP). The project would be consistent with the General Plan and Community Plan land use designations. The UCP identifies development intensity allocations associated with each sub-area within the community as a means of reducing traffic generation. The purpose of the development intensity allocations is to establish guidelines for development in the community. The basis for regulating the intensity of development is the finite traffic capacity of the projected circulation system (freeways and surface streets).

The project would involve a Community Plan Amendment to transfer square footage from Subarea 11 to Subarea 12 and a Planned Development Permit to amend Planned Industrial Development Permit 90-0892 to allow for the transfer of square footage from lots 3A, 3B, and 3D within Subarea 12 and amend Planned Industrial Development Permit 96-7756 to reflect proposed square footage reallocations. Although the project would increase the allocated development intensity of the project site, it would decrease the allocated development intensity of other sites in University Community Plan Subarea 11 and Subarea 12. Overall, after proposed transfers, the square footage increase would be 29,987 square feet (FAR), which would be offset through implementation of TDM measures targeting a reduction in project trips during peak hours. Thus, the project would not obstruct or conflict with implementation of the RAQS, resulting in a less than significant impact.

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

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The project would result in short-term emissions from construction and long-term emissions associated with project operation. Construction and operational emissions associated with the project were modeled by RECON Environmental, Inc. using the California Emissions Estimator Model (CalEEMod) software version 2016.3.2 (RECON Environmental, Inc. 2017a).

The SDAPCD does not provide specific numeric thresholds for determining the significance of air quality impacts under California Environmental Quality Act (CEQA). However, the SDAPCD does specify Air Quality Impact Analysis trigger levels for new or modified stationary sources (SDAPCD Rules 20.1, 20.2, and 20.3). The SDAPCD does not consider these trigger levels to represent adverse



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air quality impacts, rather, if these trigger levels are exceeded by a project, the SDAPCD requires an air quality analysis to determine if a significant air quality impact would occur. While, these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels are used to evaluate the increased emissions that would be discharged to the San Diego Air Basin (SDAB) if the project were approved.

The SDAPCD trigger levels are, however, utilized by the City Significance Determination Thresholds (City of San Diego 2016) as one of the considerations when determining the potential significance of air quality impacts for projects within the city. Project emissions and the air quality impact screening criteria used in this analysis are shown in Table 1.

<b>Table 1</b> <b>Maximum Daily Construction and Operational Emissions</b> <b>(pounds per day)</b>			
Pollutant	Project Emissions <sup>1</sup>	Significance Threshold	Exceeds Threshold?
<i>Construction Emissions</i>			
Oxides of Nitrogen (NO <sub>x</sub> )	115	250	<b>No</b>
Volatile Organic Compounds (VOC)	124	137	<b>No</b>
Coarse Particulate Matter (PM <sub>10</sub> )	10	100	<b>No</b>
Fine Particulate Matter (PM <sub>2.5</sub> )	6	67	<b>No</b>
Oxides of Sulfur (SO <sub>x</sub> )	>1	250	<b>No</b>
Carbon Monoxide (CO)	48	550	<b>No</b>
<i>Operational Emissions</i>			
Oxides of Nitrogen (NO <sub>x</sub> )	8	250	<b>No</b>
Volatile Organic Compounds (VOC)	7	137	<b>No</b>
Coarse Particulate Matter (PM <sub>10</sub> )	5	100	<b>No</b>
Fine Particulate Matter (PM <sub>2.5</sub> )	1	67	<b>No</b>
Oxides of Sulfur (SO <sub>x</sub> )	>1	250	<b>No</b>
Carbon Monoxide (CO)	21	550	<b>No</b>
SOURCE: City of San Diego 2016.			
<sup>1</sup> Average daily construction and operations emissions vary by season. Worst-case emissions are shown.			

As shown in Table 1, project-generated construction and operational emissions would be less than the significance thresholds for all criteria pollutants. Therefore, the project would not substantially contribute to an exceedance of NAAQS or CAAQS and thus would not contribute substantially to an existing or projected air quality violation due to consistency of the project with adopted air quality plans. Impacts would be less than significant.

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

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The SDAB is moderate non-attainment area for the 1997 8-hour ozone standard (revoked) and 2008 federal 8-hour ozone standard (U.S. Environmental Protection Agency 2017a). The SDAB is an

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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attainment area for all other NAAQS. Additionally, the SDAB is a non-attainment area for state ozone (O<sub>3</sub>), 10-micron particulate matter (PM<sub>10</sub>) standard, and 2.5-micron particulate matter (PM<sub>2.5</sub>) standards. The SDAB is an attainment area for all other CAAQS.

Regional PM<sub>10</sub> and PM<sub>2.5</sub> emissions originate directly from sources such as motor vehicles, factories, unpaved roads, stone crushing, construction sites, wood burning. Additionally, fuel combustion in motor vehicles, at power plants, and in other industrial processes can indirectly contribute to PM<sub>10</sub> and PM<sub>2.5</sub> concentrations when exhaust gases react with water vapor in the atmosphere to form particles.

Ozone is not emitted directly, but is a result of atmospheric activity on precursors. Oxides of nitrogen (NO<sub>x</sub>) and reactive organic gas (ROG) are known as the chief “precursors” of ozone. These compounds react in the presence of sunlight to produce ozone. Sources of ozone precursors include motor vehicles, power plants, industrial boilers, refineries, chemical plants, and other sources chemically react in the presence of sunlight. Motor vehicles and other mobile sources (ships, trains, construction equipment, etc.) account for approximately 92 percent of all regional NO<sub>x</sub> emissions and 44 percent of all regional ROG emissions (SDAPCD 2016).

Refer to Responses III(a) and III(b) above. As shown in Table 1, construction and operational emissions would be less than the applicable thresholds for all criteria pollutants and are accounted for in regional air quality plans. Therefore, the project would not result in a cumulatively considerable net increase in emissions of nonattainment pollutants (ozone and particulate matter). The project would not result in a cumulatively considerable increase in any criteria pollutant for which the region is in non-attainment under applicable federal or state ambient air quality standards, and impacts therefore would be less than significant.

d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The term “sensitive receptor” refers to a person in the population who is more susceptible to health effects due to exposure to an air contaminant than the population at large or to a land use that may reasonably be associated with such a person. Examples include residences, schools, childcare centers, retirement homes, long-term health care facilities, and outdoor recreation areas, such as athletic fields.

The nearest sensitive receptors include the residences approximately 800 feet southwest of the project site (along Camino Del Vida and Easter Way).

### Construction

Construction of the project would result in the generation of diesel-exhaust Diesel Particulate Matter (DPM) emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities and on-road diesel equipment used to bring materials to and from the project site. Due to the short-term nature of construction and the distance between the project site and the nearest sensitive receptor, DPM generated by project construction is not anticipated to result in conditions where the probability is greater than 10 in 1 million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations



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of noncarcinogenic air toxics exceeds a Hazard Index greater than 1 for the Maximally Exposed Individual. Therefore, impacts to sensitive receptors would be less than significant.

### Operation

The project would include the installation of new mechanical equipment including boilers, a standby generator, and a cooling tower. Consistent with SDAPCD Rule 10 construction of any stationary equipment that would emit substantial air contaminant would be subject to SDAPCD requirements. Additionally, consistent with SDAPCD Rule 1200 the permitting review would require a health risk assessment to demonstrate that impacts are less than 1 in a million excess cancer risk without use of Toxics Best Available Control Technology, or less than 10 in a million excess cancer risk with Toxics Best Available Control Technology. The health risk assessment demonstrating the risk associated with the new sources would be required prior to issuance of these permits. The project is required to comply with all state, local, and federal rules and regulations, which include SDAPCD Rule 1200. Accordingly, the boilers, generators, and cooling towers cannot be installed without demonstrating that health risks are below the above-stated performance standards. Thus, with implementation of applicable SDAPCD permit requirements, toxic air contaminant (TAC) impacts associated with project operation would be less than significant.

### CO Hot Spots

A carbon monoxide (CO) hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hotspots have the potential to violate state and federal CO standards at intersections, even if the broader basin is in attainment for NAAQS and CAAQS. The Caltrans Project-Level CO Protocol (CO Protocol) screening procedures have been utilized to determine if the project could potentially result in a CO hotspot (U.C. Davis Institute of Transportation Studies 1997). As indicated by the CO Protocol, localized CO concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. Under specific meteorological conditions (e.g., stable conditions that result in poor dispersion), CO concentrations may reach unhealthy levels with respect to local sensitive land uses. CO hotspots due to traffic almost exclusively occur at signalized intersections that operate at a Level of Service (LOS) E or below (i.e. failing intersections). Projects may result in or contribute to a CO hotspot if they worsen traffic flow at signalized intersections operating at LOS E or F.

Intersection operations under existing, near-term, and horizon year (2035) conditions were analyzed in the project Transportation Impact Analysis (Urban Systems Associates 2017). Accounting for project-generated traffic, required traffic mitigation measures, ambient growth, and completion of other proposed projects, the following intersections would operate at LOS E or below in the horizon year (2035) with project conditions:

- Eastgate Mall at Genesee Avenue (LOS E during AM Peak Hour)
- Towne Centre Drive at Eastgate Mall (LOS E during AM Peak Hour)
- Towne Centre Drive at Executive Drive (LOS E during AM and PM Peak Hours)
- Towne Centre Drive at La Jolla Village Drive (LOS E during AM and PM Peak Hours)
- I-805 Southbound Ramps at La Jolla Village Drive (LOS F during AM Peak Hours)

According to the CO Protocol, the three worst intersections would require detailed modeling in order to determine if the CO emissions exceeded the thresholds. If one of the intersections fails,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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then the next worst intersection would be modeled until it is determined that none of the remaining intersections would exceed the NAAQS or CAAQS. As defined by vehicle volumes and average vehicle delay, the three worst intersections were included in modeling. These intersections are:

1. I-805 Southbound Ramps at La Jolla Village Drive (94.1 second delay at AM Peak Hour)
2. Towne Centre Drive at La Jolla Village Drive (70.0 second delay at PM Peak Hour)
3. Towne Centre Drive at Executive Drive (61.3 second delay at PM Peak Hour)

CALINE4, a computer air emission dispersion model, with a graphic interface (CalRoads View), was used to calculate CO concentrations at receivers located at each of the three worst intersections. These concentrations were derived from inputs including traffic volumes from the traffic analysis and emission factors from EMFAC2014 (CARB 2014). The detailed modeling is based on the long-term buildout plus design event peak hour traffic volumes and emission factors from EMFAC2014. The one-hour background concentration of CO for the area, 2.8 parts per million, was included in the model. This ambient concentration is considered conservative, as it is the highest recorded hourly concentration over the past five years at the San Diego–Beardsley Street monitoring station. This concentration was assumed for all three intersections. The average regional winter low temperature of 49 degrees Fahrenheit (°F) was included in the model as reported by the Western Regional Climate Center data for the project area. For a worst-case meteorological setting, the wind angle assumes all wind is blowing at each receptor. The mixing height of pollutants was set at 1,000 feet with a stable atmosphere. The results of the modeling for these intersections are summarized in Table 2. CALINE4 output is contained in the Emission Modeling Results for 9775 Towne Centre Drive Project (RECON 2017a).

Table 2 Intersection Analysis - Maximum CO Concentrations (ppm)					
Roadway	CO Concentration		Standard CAAQS/NAAQS		Exceeds?
	1-Hour	8-Hour	1-Hour	8-Hour	
I-805 Southbound Ramps at La Jolla Village Drive	4.2	2.9	20/35	9.0/9	No
Towne Centre Drive at La Jolla Village Drive	3.9	2.7			No
Towne Centre Drive at Executive Drive	3.5	2.5			No
NOTE: CO concentrations are based on intersection turning volumes provided in the project's Transportation Impact Analysis (TIA).					
18-hour concentrations developed based on a 0.7 persistence factor.					

As shown, the maximum 1-hour concentration would be 4.2 ppm. This concentration is below the federal and state 1-hour standards. In order to determine the 8-hour concentration, the 1-hour value was multiplied by a persistence factor of 0.7, as recommended in the CO Protocol. Based on this calculation, the maximum 8-hour concentration would be 2.9 ppm. Thus, increases of CO due to the project would be below the federal and state standards. Therefore, the project would have less than significant impacts with respect to exposing sensitive receptors to substantial pollutant concentrations.

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



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The potential for an odor impact is dependent on a number of variables including the nature of the odor source, distance between the receptor and odor source, and local meteorological conditions. During construction, potential odor sources associated with the project include diesel exhaust associated with construction equipment. Diesel exhaust may be noticeable temporarily; however, existing office tenants in the surrounding area would be primarily indoors and other receptors are not located close enough to be affected by construction odors. Further, construction activities would be temporary. Therefore, the diesel exhaust odors would not result in significant impacts. Land uses commonly associated with operational odor impacts include wastewater treatment facilities, waste transfer stations, landfills, composting operations, refineries, and agricultural operations. The project does not propose these uses and would not include activities known to cause objectionable odors. Impacts would be less than significant.

#### IV. BIOLOGICAL RESOURCES – Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

A Biological Resource Report was prepared by RECON Environmental, Inc. (RECON) to address potential biological resource impacts for the project site (RECON 2018). The Biological Resources Report focuses on a 5.59-acre impact footprint that includes the developed portion of the larger 12.11-acre project site and a small 0.16 off-site area that extends into the project frontage. The project site lies within the boundaries of the City's Multiple Species Conservation Plan (MSCP) Subarea. Furthermore, the Multi-Habitat Planning Area (MHPA) is mapped on-site and adjacent to the project. The results of this analysis are discussed below.

Two sensitive vegetation communities were identified within the project site, including 5.78 acres of coastal sage scrub, 1.31 acres of non-native grassland, and 5.02 acres of developed lands. Project site grading, construction, and landscaping would impact 5.28 acres of the project site including 0.12 acre of coastal sage scrub in the eastern corner of the project site, which is considered an environmentally sensitive lands (ESL) Tier II sensitive habitat. Non-native grassland would not be impacted by the project. An additional 0.29 acre of Tier II habitat comprised of coastal sage scrub would be affected due to the implementation of Brush Management Zone 2 (BMZ 2). BMZ 2 impacts are considered impact neutral pursuant to the Biology Guidelines (City of San Diego 2012) and would not require mitigation.

Impacts to sensitive vegetation communities (coastal sage scrub) were addressed in the hereby incorporated Eastgate Technology Park Environmental Impact Report (EQD No. 81 12 31; City of San Diego 1982), which is available for review at the City Development Services Department. The footprint of the currently proposed project is entirely within the project footprint identified in the Eastgate Technology Park Environmental Impact Report. Mitigation measures outlined in the Environmental Impact Report were previously implemented when the entire site was graded, including mitigation for the 0.12 acre of coastal sage scrub that would be affected by the current

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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project. Therefore, there are no new impacts to the existing coastal sage scrub outside what was originally authorized for development, and no new mitigation is required.

Two sensitive plant species were identified within the project site, which includes Nuttall's scrub oak (*Quercus dumosa*) and Torrey pines (*Pinus torreyana*). The project would directly impact approximately six Nuttall's scrub oak individuals. Although this species is considered rare by California Native Plant Society (CNPS), it is not covered by the City's MSCP nor does it have federal or state status. Therefore, impacts to this species are not expected to reduce the regional population to a less than self-sustaining level, and impacts would be less than significant. Although Torrey pines, an MSCP covered species with CNPS rare plant ranking of 1B.2, are present within the project site, these trees are not naturally occurring and are not considered sensitive. Additionally, the project would retain all existing Torrey pine trees on-site. Therefore, any impacts to Torrey pines would be less than significant.

No sensitive wildlife species were observed on-site during the general survey; however, coastal California gnatcatcher (*Polioptila californica californica*) was detected immediately adjacent to the project site within the MHPA. In addition, five sensitive wildlife species have a moderate to high potential to occur/nest on-site within the native habitats in the MHPA, adjacent of the project site. Area Specific Management Directives (ASMDs) provided as conditions of coverage for MSCP covered species facilitate further protection of these species. Project compliance with the MSCP Subarea Plan Land Use Adjacency Guidelines address ASMDs developed for the sensitive species with potential to occur on-site and would minimize and avoid indirect impacts to those species. These Land Use Adjacency Guidelines will be conditions of project approval and generally address edge effects by discouraging human entry into the MHPA (by installing barriers), minimizing disturbance to species during nesting periods, prohibiting drainage into the MHPA, requiring light to be directed away from the MHPA, prohibiting invasive species adjacent to the MHPA, and implementing brush management requirements. Adverse indirect impacts related to noise would be avoided through the prohibition of clearing, grubbing, grading, or other construction activities during the breeding season of the coastal California gnatcatcher unless a qualified biologist surveys habitat subject to construction noise for the presence of the species. If the species is detected, construction may proceed provided a noise analysis is completed showing that noise levels would be attenuated (e.g. temporary fencing) so that noise does not exceed 60 A-weighted decibels (db(A)) hourly average at the edge of occupied habitat. Details of these requirements are contained in the MSCP Subarea Plan Land Use Adjacency Guidelines and the Biological Resources Report prepared for the project (RECON 2018). These measures would avoid potentially significant impacts to sensitive wildlife species by ensuring adjacent habitats are protected from disturbance. The other two sensitive species with the potential to occur (coastal whiptail and San Diego desert woodrat) are CDFW species of special concern but are not covered by the MSCP. No ASMDs have been developed for these species; however, impacts to these species would be avoided through the implementation of ASMDs for coastal California gnatcatcher, which also reside in coastal sage scrub. Therefore impacts to sensitive wildlife species would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is currently developed and includes buildings, hardscape, and landscaping. The project site does not contain any sensitive riparian habitat or other identified habitat community, resulting in no impact.

c) Have a substantial adverse effect on federally protected wetlands as defined by section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is currently developed and includes buildings, hardscape, and landscaping. The project site does not contain any wetlands as defined by section 404 of the Clean Water Act, sensitive riparian habitat or other identified habitat community, resulting in no impact.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. The northeastern portion of the project site is part of an urban canyon system bounded by industrial development, roads, and fencing which ultimately restrict its use by wildlife. Furthermore, the canyon is not designated as a MSCP regional wildlife corridor as it does not provide a throughway for wildlife species by connecting with major areas of off-site habitat. Therefore, the project site would not be considered a significant wildlife movement corridor and would not interfere within the movement of any native resident or migratory species, impact an existing wildlife corridor, or impede the use of a native wildlife nursery site, resulting in no impact.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project landscape plan identifies existing trees to be retained and removed with construction. Street trees would be maintained and/or replaced in accordance with Section 142.0409 of the City's Landscape Regulations and the University Community Plan. As such, the project would not conflict with any local policies or ordinances protecting biological resources, resulting in a less than significant impact.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project site lies within the boundaries of the City's MSCP Subarea Plan. The City's MHPA is mapped onsite. MHPA Lands are those that have been included within the City's MSCP Subarea Plan for habitat conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region.

Of the 7.73 acres of mapped MHPA, approximately 1.04 acres would be corrected out of the MHPA. The proposed MHPA boundary line correction would move the MHPA boundary line northeast to align with the currently proposed development limits of disturbance. Additionally, 0.26 acre of land within the northeastern end of the existing open space easement would also be added to the MHPA.

Due to the presence of the MHPA in close proximity to the site, the project would be required to comply with the Land Use Adjacency Guidelines (Section 1.4.3) of the City's MSCP Subarea Plan in order to ensure that the project would not result in any indirect impacts to the MHPA. Per the MSCP, potential indirect effects from drainage, toxics, lighting, noise, barriers, invasives, and brush management from project construction and operation must not adversely affect the MHPA.

The project as designed would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Impacts would be less than significant.

#### V. CULTURAL RESOURCES – Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The existing buildings within the project site were constructed in 1985 and are not 45 years old and are therefore not considered historical resources under CEQA. No impact would result.

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

The project site is located on the City of San Diego's Historical Resources Sensitivity Map. Therefore, a record search of the California Historic Resources Information Systems (CHRIS) was conducted, and reviewed by qualified archaeological City staff to determine presence or absence of potential resources within the project site. Historic resources were not identified within or adjacent to the project site. Furthermore, according to the Geotechnical Investigation prepared for the project (GEOCON 2016), the project site has been previously graded to allow for the existing development, and fill has been previously placed across the site from approximately 1.5 feet to 45 feet from the existing grade. Below undocumented fill, geologic formation was encountered (Ardath Formation).

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Therefore, there is no potential for project grading to impact any unique or non-unique archaeological resources.

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

Fossils (paleontological resources) are the remains and/or traces of prehistoric life and represent an important and nonrenewable natural resource. Impacts to paleontological resources may occur during grading activities associated with project construction where excavation would be done in previously undisturbed geologic deposits/formations/rock units. According to the Geotechnical Investigation (GEOCON 2016), the project area is underlain by Ardath Formation. The Ardath Formation has been categorized as having a high paleontological resource sensitivity rating.

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

The project would involve approximately 70,000 cubic yards of cut and would excavate to a maximum depth of 25 feet. Considering the high paleontological sensitivity rating for underlying geology and the shallow depth of geologic formations, project grading activities would have potential to disturb or destroy paleontological resources. Disturbance or loss of fossils would be considered a significant environmental impact.

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

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

All of the area to be impacted by the project has been heavily disturbed by grading for the original construction, and the potential for subsurface deposits to remain in these areas is extremely low. Subsurface materials consist of undocumented fill, very old terrace deposits, and bedrock (Ardath Formation). No cemeteries, formal or informal, have been identified on or adjacent to the project site, and none were encountered during previous grading activities associated with the construction of the existing building located within the project site. While there is a very low possibility of encountering human remains during subsequent project construction activities, it is noted that activities would be required to comply with state regulations that are intended to preclude impacts to human remains. Per CEQA Section 15064.5(e), the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5), if human remains are discovered during construction, work would be required to halt in that area, and no soil would be exported off-site until a determination could be made regarding the provenance of the human remains via the County Coroner and other authorities as required.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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VI. GEOLOGY AND SOILS – Would the project:

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

☐
☐
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A Geotechnical Investigation was prepared for the project site (GEOCON 2016). Based on this Geotechnical Investigation, the project site is not located within a State of California Earthquake Fault Zone. However, there is an unnamed fault traversing the descending slope located within the northeast portion of the project site, which has been labeled as potentially active, inactive, presumed inactive, or activity unknown, and faulting is understood to be older than 11,000 years.

There are seven known active faults located within a 50-mile radius of the project site. The closest known active faults nearest the project site are the Newport-Inglewood fault and Rose Canyon fault; both located approximately 4 miles west of the project site. These faults have the potential to generate earthquakes at a Maximum Earthquake Magnitude (Mw) of 7.5 and 6.9, respectively. Earthquakes that generate from these faults or from other faults within southern California are potential generators of significant ground motion at the project site.

Construction in accordance with the California Building Code reduces the potential impacts associated with an earthquake to an acceptable level of risk. Therefore, impacts would be less than significant.

- ii) Strong seismic ground shaking?

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☐
☒
☐

Refer to VI(a)(i). Impacts would be less than significant.

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

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☐
☒
☐

Liquefaction generally occurs in areas where four criteria are met: the site is subject to seismic activity; on-site soil consists of cohesionless soil or silt and clay with low plasticity; groundwater is encountered within 50 feet of the surface; and soil relative densities are less than 70 percent. Seismically induced settlement can occur whether the potential for liquefaction exists or not. Within the project site, the potential for liquefaction or seismically induced settlement is considered to be low, due to the absence of a near-surface groundwater elevation and the dense to very dense nature of the on-site soils. As such, the likelihood of the project to expose people to seismic related ground failure or liquefaction is considered to be low, resulting in a less than significant impact.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An area approximately 400 feet east of the building footprint, within the approximately 275-foot native hillside slope that exists on-site, has been mapped by the City as “Landslides: confirmed, known, or highly suspected”. However, the portion of the project site where the proposed building and landscaped areas would be located does not contain previous landslide debris. The topography of the site where the building would be located is generally flat. As such, the risk associated with landslide hazard is low. In addition, the topography of the site is generally flat. Based on the existing topography and landforms, the project would not subject people or structures to landslides. Impacts would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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All grading activities within the site would be required to comply with the City Grading Ordinance, which ensures soil erosion and topsoil loss is minimized through the issuance of a Grading Permit. Grading permits typically require projects to implement measures to prevent surface waters from damaging the face of any excavation or fill, ensuring erosion is minimized. Additionally, the project would employ best management practices to control erosion and prevent topsoil from exiting the site. Thus, impacts due to substantial soil erosion or the loss of topsoil would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As discussed in VI(a) and VI(b), the project site is not likely to be subject to landslides, and the potential for liquefaction and subsidence is low. Some of the soils underlying the site have a “very low” expansion potential while other areas of the site have “high” expansion potential. However, the project would comply with the requirements of the California Building Code, thereby ensuring risks associated with expansive soils are minimized. As such, impacts due to expansive soils would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Based on boring tests completed on-site, soils on the project site are considered to be both “non-expansive” (Expansion Index [EI] of 20 or less) and “expansive” (EI greater than 20) as defined by Section 1803.5.3 of the 2016 California Building Code. In areas of surface improvements (pavement, hardscape, etc.) outside the building pad, undocumented fill will be removed and replaced as compacted fill in order to provide a suitable building surface and comply with geotechnical report recommendations. Per the geotechnical report, where expansive soils are encountered (EI greater than 90), the expansive soils will not be reused in structural improvement areas and will be exported from the site or used in non-structural areas. Where very old terrace deposits are encountered at

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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subgrade elevations, no additional removals are required. With implementation of geotechnical report recommendations as required by the San Diego Municipal Code (Chapter 14), impacts associated with expansive soils would be less than significant.

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

The project will be served by existing sewer infrastructure and would not require septic tanks or alternative waste water disposal systems. No impact would occur.

#### VII. GREENHOUSE GAS EMISSIONS – Would the project:

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

In December 2015, the City adopted a Climate Action Plan (CAP) that outlines the actions that the City will undertake to achieve its proportional share of state greenhouse gas (GHG) emissions reductions. A CAP Consistency Checklist was adopted on July 12, 2016 and subsequently revised on June 2017. The purpose of the CAP Consistency Checklist is to, in conjunction with the CAP, provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA.

Analysis of GHG emissions and potential climate change impacts from new development is required under CEQA. The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3) and 15130(b), a project's incremental contribution to GHG emissions may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.

The CAP Consistency Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of these measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP as determined through the use of the CAP Consistency Checklist may rely on the CAP for the cumulative impacts analysis of GHG emissions. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP.

As detailed in the project-specific CAP Consistency Checklist Step 1 (Land Use Consistency), the project is consistent with the allowed uses per the General Plan and Community Plan land use designations, as well as the zoning designation for the project site, which allows for Industrial Scientific Research and Development land use. While the project includes a Community Plan Amendment (CPA) to allow a transfer of density between subareas, the land use designation and type of development would not change. Thus, the project would be consistent with the land use assumptions used in the development of the CAP.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Furthermore, completion of Step 2 of the CAP Consistency Checklist demonstrates that the project would be consistent with applicable strategies and actions for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. Thus, the project is consistent with the CAP.

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

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

Refer to VII(a). Impacts would be less than significant.

#### VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

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

Construction and operation of the project may require the use of hazardous materials (fuels, lubricants, solvents, etc.), which would require proper storage, handling, use and disposal. The project would comply with all applicable hazardous materials regulations during project construction and operation, resulting in a less than significant impact.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

According to the California Department of Toxic Substances Control EnviroStor Database, State Water Board GeoTracker database, and other resources compiled pursuant to Government Code Section 65962.5, no record of leaking Underground Storage Tank (UST) cleanup sites, permitted USTs, or other hazardous sites were identified on the project site. If construction activities encounter underground contamination, the contractor would be required to implement Section 803, "Encountering or Releasing Hazardous Substances or Petroleum Products," of the City Standard Specifications for Public Works Construction, which is included in all construction documents and would ensure the proper handling and disposal of any contaminated soils in accordance with all applicable local, state, and federal regulations. Compliance with these requirements would minimize the risk to the public and the environment; therefore, impacts would be less than significant.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not within one-quarter mile from an existing or proposed school, resulting in no impact.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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According to the California Department of Toxic Substances Control EnviroStor Database, State Water Board GeoTracker database, and other resources compiled pursuant to Government Code Section 65962.5, the project site is not located on a site which is included on a list of hazardous materials sites and would not create a significant hazard to the public or environment. Thus, no impact would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two mile of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project site is within the MCAS Miramar Airport Land Use Compatibility Plan (ALUCP) Review Area 1, ALUCP Noise Contours (60 to 65 CNEL), FAA Part 77 Noticing Area, and Airport Safety Zone Accident Potential Zone 2/Transition Zone and would therefore be subject to the ALUCP regulations.

The project would comply with the noise, safety, and airspace protection compatibility requirements in Sections 132.1510 through 132.1525 of the Land Development Code (LDC). Specifically, Research and Development (R&D) industrial development is permitted within the 60 to 65 CNEL aircraft noise exposure area per Section 132.1510, Table 132-15D of the LDC. In addition, R&D facilities are identified as a permitted use within the Transition Zone of MCAS Miramar, and as a limited use within the Accident Potential Zone II of MCAS Miramar (R&D Use is limited to 0.34 FAR; project proposes a 0.31 FAR), per Section 132.1515(f), Table 132-15F of the LDC. The highest elevation of grade on the project site is 405 feet above mean sea level. The difference between the lowest Part 77 notification surface and the highest elevation of grade equals 170 feet, and as such, the project would not penetrate the notification surface. In addition, since no structures are proposed at 200 feet above grade, the project would not be required to notify the FAA.

An Airport Land Use Commission (ALUC) Consistency Determination was made for the project (San Diego County Regional Airport Authority, 2017), in which ALUC staff determined that the project is consistent with the MCAS Miramar ALUCP. As such, it has been determined that the project would comply will all ALUCP requirements; therefore, the project would not subject people working or

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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residing within the project area to a significant safety hazard and impacts would be less than significant.

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

The project site is not within the vicinity of a private airstrip, resulting in no impact.

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

The project site is located in a developed area with access to major roadways. The project would not modify the existing roadway network in the surrounding area and would maintain access to the project site. Therefore, the project would not impair or interfere with an adopted emergency response plan or emergency evacuation plan.

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

The project site is located within a Very High Fire Hazard Severity Zone per the City Very High Fire Hazard Severity Zone Map. However, the project would be required to comply with City Brush Management Regulations, Section 142.0412 of the Municipal Code, as well as the San Diego Fire-Rescue Department Fire Prevention Bureau Policy B-08-1 and the City of San Diego Fire Safety and Brush Management Guide. Compliance with these regulations would ensure impacts are less than significant.

#### IX. HYDROLOGY AND WATER QUALITY – Would the project:

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

The project would comply with the City's Stormwater Management and Discharge Control Ordinance (Municipal Code Chapter 4, Article 3, Division 3), Storm Water Runoff and Drainage Regulations (LDC Section 142.02 et al.), and other applicable storm water quality standards during and after construction. Treatment control best management practices (BMPs) have been selected that would ensure pollutants are not discharged to receiving waters. Proposed BMPs as fully described in the storm water quality management plan (Latitude 33 2017c) are summarized below.

The project would employ site design, source control and structural BMPs in addition to hydromodification control measures. Site design BMPs include conserving natural areas, soils, and vegetation, minimizing impervious areas by including landscaped areas and placing parking underground, minimizing soil compaction, dispersing the impervious areas, collecting runoff in

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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biofiltration basins, and use of native or drought-tolerant species for landscaping purposes. Source control BMPs include the prevention of illicit discharges into the municipal storm drain system by providing an on-site storm drain system, storm drain stenciling or signage, and the placement of trash and storage areas underground to prevent dispersion by rain, run-on, run-off and wind. Structural BMPs include the use of biofiltration basins throughout the site, and an underground detention vault for pollutant control and hydromodification management.

These requirements have been reviewed by qualified City staff and would be re-verified during the ministerial building permit process. Adherence to applicable water quality standards would ensure adverse impacts associated with compliance with quality standards and waste discharge requirements are avoided. Impacts would be less than significant.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would retain the existing public water service connections and would not use groundwater for any purpose. Additionally, impervious surfaces are expected to be reduced by approximately 29,965 square feet compared to the existing condition, resulting in a potential increase in storm water infiltration and potential groundwater recharge. As such, the project would not result in an impact.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

A site-specific drainage study was prepared for the project (Latitude 33, 2017d) that evaluates the existing and proposed drainage patterns. In the post-project condition, the project would maintain existing drainage patterns, while improving the drainage characteristics (i.e., overall impervious area and flow pattern) in comparison to the existing drainage characteristics of the site. On-site runoff would be collected via private storm drain systems before being treated and detained within biofiltration facilities and underground storage vaults. The runoff would then be discharged from the storage vaults into the existing 24-inch storm drain system within Towne Centre Drive.

In the post-project condition, impervious surfaces on the project site would be reduced by approximately 29,965 square feet, compared to the existing condition due to the reduction in hardscape area and the incorporation of additional landscape area. New biofiltration basins and storm drains are proposed to capture and convey runoff from the site; however all runoff will continue to discharge to the existing storm drain system along Towne Centre Drive. Underground storage vaults would be installed that would control the hydromodification impact of the project.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Drainage would flow from biofiltration basins or other treatment structures to the vaults to provide capacity to retain larger volumes of water and control peak flows. These drainage improvements would improve the existing condition peak flow rate to prevent erosion and siltation off-site. According to the Drainage Study, the reduction in impervious area and inclusion of BMPs in the proposed condition would reduce the 100-year storm peak flow rates from 20.08 cubic feet per second (cfs) to 13.74 cfs, resulting in a 6.74 cfs decrease in peak flow rates for the 100-year storm.

Substantial alterations to the existing drainage patterns are not proposed. The project design would result in a reduction in impervious surfaces, would decrease the peak flow rates at the drainage exit points, and incorporate BMPs to control erosion and siltation. Impacts related to drainage would be less than significant.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Refer to IX(c). Impacts would be less than significant.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would maintain existing drainage patterns. On-site runoff would be collected via private storm drain systems before being treated and detained within biofiltration facilities and underground storage vaults. Runoff would then be discharged from the storage vaults and into the existing 24-inch storm drain system within Towne Centre Drive. Water quality would be treated before exiting the project site by storm water BMPs, including biofiltration and an underground detention basin. Additionally, the proposed condition peak flow rate from the site is reduced and thus, the project runoff would not exceed the capacity of storm water drainage systems. Thus, the project would result in a less than significant impact related to storm water drainage systems and polluted runoff. Refer also to IX(c) and IX(f).

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| f) Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project is considered a Priority Development Project and is, therefore, required to implement structural BMPs for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards). The project would implement five structural BMPs for storm water pollutant control consisting of biofiltration basins and underground detention vault to provide hydromodification and pollutant control for the entire site. With the implementation of these BMPs, runoff would be treated to remove pollutants before exiting the project site. Furthermore, the project would comply with all applicable storm water regulations during construction and operation of the project including a statewide General National Pollution Discharge Elimination System permit

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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for Storm Water Discharges Associated with Construction Activities. Compliance with existing storm water quality regulations including the storm water BMPs outlined in the project's storm water quality management plan (Latitude 33 2017c), would ensure water quality impacts are less than significant.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not include the development or relocation of housing, resulting in no impact.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project is not located within a Federal Emergency Management Agency (FEMA) designated floodplain or floodway, per the FEMA Flood Insurance Rate Map (Number 06073C1339G), resulting in no impact.

X. LAND USE AND PLANNING – Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would require the demolition of the existing Scientific Research facility, and construction of a four-story 165,000-square-foot (FAR) scientific research building over a 150,405-square-foot parking structure. The project would not substantially change the nature of the surrounding area and would not introduce any barriers or project features that could physically divide the community. Thus, the project would result in no impact related to physically dividing an established community.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is designated Industrial-Scientific Research per the City General Plan and University Community Plan, and is zoned as IP-1-1 under the City Zoning Map. The purpose of the IP zone is to provide for high-quality science and business park development. Therefore, the proposed use as a Scientific-Research facility would not conflict with the General Plan land use designation or the zoning code, resulting in no impact.

In addition, the project was reviewed in light of the goals and policies for industrial development as identified in the University Community Plan. The University Community Plan allows for a transfer of development rights within subdivisions with a Planned Development Permit (Development Intensity Element Section V, E). The project would transfer development rights within the existing Planned

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Industrial Development Permit No. 90-0892 through a Planned Development Permit consistent with the University Community Plan policy. The transfer of development rights between Development Intensity Element subareas requires an amendment to Table 3 of the University Community Plan. With adoption of the amendment to the University Community Plan, the proposed transfers would be consistent with the University Community Plan and would not result in any significant environmental impacts. The project would be consistent with the goals and policies of the University Community Plan, as the project is located in an area planned for industrial development, or more specifically, for scientific research uses. Per the University Community Plan, the uses contemplated within the Scientific Research zone are research laboratories, supporting facilities, headquarters or administrative offices and personnel accommodations, and related manufacturing activities. As such, the land use proposed by the project would not conflict with the University Community Plan, resulting in no impact.

#### Noise – Land Use Compatibility

The City General Plan Noise Element specifies compatibility standards for different categories of land use. The noise land use compatibility guidelines are intended to be used to prevent future incompatibilities for future development within San Diego. Exterior use areas associated with corporate offices and research and development facilities are considered “compatible” with CNELs up to 65 CNEL and “conditionally compatible” with up to 75 CNEL. Proposed exterior use areas would include the deck along the north side of the proposed building and the east-facing terrace along the eastern side of the proposed building.

Transportation facilities to the west of the project site include Towne Centre Drive. As identified in the project Transportation Impact Analysis, horizon year traffic volumes would reach 14,800 ADT. Traffic noise levels attenuate to 65 CNEL approximately 128 feet from the centerline of Towne Centre Drive. The nearest exterior use area would be the deck along the north side of the proposed building. The distance from the centerline of Towne Centre Drive to the nearest part of the deck is approximately 210 feet; at this distance, traffic noise levels would reach 63 CNEL. Traffic noise levels associated with Towne Centre Drive would not exceed the applicable noise-land use compatibility standard of 65 CNEL specified in the General Plan Noise Element. Traffic noise exposure would be consistent with the City noise-land use compatibility standards. Impacts would be less than significant.

Transportation facilities to the east of the project site include I-805 and the railroad located in Sorrento Valley (operated by Coaster and Amtrak). I-805 freeway is approximately 1,900 feet west of the project site and the railroad is approximately 515 feet east of the project site. Ambient noise levels along the eastern side of the project site were measured at 60.6 dB(A)  $L_{eq}$ . Thus, cumulative transportation noise levels associated with I-805 and the railroad located in Sorrento Valley are not anticipated to exceed the applicable noise – land use compatibility standard of 65 CNEL. Traffic noise exposure would be consistent with the General Plan Noise Element noise – land use compatibility standards. Impacts would be less than significant.

Overall the project would be consistent with the applicable land use plan and therefore, impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Refer to IV(f). No impact would occur.

XI. MINERAL RESOURCES – Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is located within an area designated as Mineral Resources Zone (MRZ-3) per the California Geologic Survey Mineral Land Classification Map, Special Report 153, Plate 16. MRZ-3 zones are classified as areas that require further exploration to determine if mineral resources are present that could warrant a reclassification to an MRZ-2 designation (areas that contain significant mineral resources). The areas around the project are not being used for the recovery of mineral resources and are not designated by the City's General Plan, University Community Plan, or other local, state, or federal land use plan for mineral resources recovery; therefore, the project would not result in the loss of mineral resources.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Refer to XI(a). No impact would occur.

XII. NOISE – Would the project result in:

a) Generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Noise measurements and modeling were prepared for the project site (RECON 2017b). The results are discussed below.

Short-Term (Construction)

Section 59.5.0404 of the City Noise Abatement and Control Ordinance restricts construction activities to between the hours of 7:00 a.m. and 7:00 p.m. and prohibits construction noise levels that exceed a 12-hour equivalent average noise level ( $L_{eq[12]}$ ) of 75 A-weighted decibels (dB[A]) as assessed at or beyond the property line of a residentially zoned property.

Project construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, removal of existing structures and pavement, loading, unloading, and placing materials and paving. Diesel engine-driven trucks also would bring materials to the site and remove the soils from excavation.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Construction equipment with a diesel engine typically generates maximum noise levels from 80 to 90 dB(A)  $L_{eq}$  at a distance of 50 feet (Federal Transit Administration 2006). During excavating, grading, and paving operations, equipment moves to different locations and goes through varying load cycles, and there are breaks for the operators and for non-equipment tasks, such as measurement. Although maximum noise levels may be 85 to 90 dB(A) at a distance of 50 feet during most construction activities, hourly average noise levels from the grading phase of construction would be 82 dB(A)  $L_{eq}$  at 50 feet from the center of construction activity when assessing the loudest pieces of equipment working simultaneously.

Construction noise generally can be treated as a point source and would attenuate at approximately 6 dB(A) for every doubling of distance. Construction activities, such as grading, generate the loudest noise levels. The nearest residential zoned properties (RM-3-7) are located southwest of the project site (along Camino Del Vida and Easter Way); these properties are occupied by apartments. The distance from the center of construction activity (center of the project site) to the nearest residential property line would be approximately 1,075 feet. Conservatively assuming no acoustic shielding from buildings or topography, project construction noise levels would be anticipated to reach 55 dB(A)  $L_{eq(12h)}$  at the property line of the nearest residential zoned property. Therefore, construction noise levels would not exceed the Noise Abatement and Control Ordinance limit of 75 dB(A)  $L_{eq(12h)}$  at the nearest residential property line. Impacts related to short-term construction noise would be less than significant.

#### On-Site Generated Noise (Stationary Noise)

The City Noise Abatement and Control Ordinance establishes noise level limits for stationary noise sources based on the applicable zoning and time of day. The project site is zoned IP-1-1 (Industrial Park). The one-hour property line noise level limits for industrial properties is 75 dB(A)  $L_{eq}$  at any time of day.

The noise sources on the project site after construction are anticipated to include delivery trucks at the loading docks, standby generators and other mechanical equipment in the equipment yard, a cooling tower, and rooftop heating, ventilation, and air conditioning (HVAC) systems.

The project includes one below-grade loading bay near the northwest corner of the building. Based on previous noise measurements of loading docks, noise levels would be anticipated to reach 66.5 dB(A)  $L_{eq}$  at a distance of 25 feet from the loading bay (Ldn Consulting 2011). This equates to a sound power level ( $L_{pw}$ ) of approximately 86 dB(A). For a worst-case scenario it was assumed that up to three trucks would use the loading docks simultaneously (although actual use is likely to be much less). Loading operations was modeled as three continuous noise sources at 3 feet above grade and with a sound power level of 86 dB(A)  $L_{pw}$ .

Representative mechanical equipment noise levels were selected for assessing potential noise from proposed generators and cooling towers. Representative noise levels for a 1,280 kilowatt Kohler® Model 1250REOZMD generator with the base sound enclosure were assessed; this size unit would be anticipated to generate noise levels of 85 dB(A) at 23 feet, which equates to a sound power level of approximately 110 dB(A)  $L_{pw}$  (RECON 2017b; Kohler Power Systems). Thus, the standby generator was modeled as a continuous noise source at 4 feet above grade and with a sound power level of 110 dB(A)  $L_{pw}$ . Representative noise levels for a 1,188-ton Evapco® Model USS 212-4L28 cooling tower were assessed; this size cooling tower would generate noise levels of 81 dB(A) at 50 feet from

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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the side of the base of the boiler and 83 dB(A) at 5 feet from the top of the boiler (RECON 2017b; Evapco). This equates to a sound power levels of approximately 96 dB(A)  $L_{pw}$  at the base of the boiler and approximately 98 dB(A)  $L_{pw}$  at the top of the boiler. Thus, the cooling tower was modeled as two distinct continuous noise sources, one at 3 feet above grade with a sound power level of 96 dB(A) and the second at 18 feet above grade and with a sound power level of 98 dB(A)  $L_{pw}$ .

Based on minimum design requirements from the Section 120.1 of the 2016 California Building Code, the air handlers for HVAC systems would be required to be sized to provide 0.15 cubic feet per minute (CFM) per square foot, thus the project air handlers would be required to supply at least 24,000 CFM. Representative noise levels for a 29,500 CFM Huntair™ Air Handler Unit were assessed; this sound power level for this size unit is approximately 89 dB(A)  $L_{pw}$  (RECON 2017b; Huntair). Thus, the project air handler unit was modeled as a continuous noise source at 3 feet above the center of the rooftop of the proposed building with a sound power level of 89 dB(A)  $L_{pw}$ . Although rooftop features such as parapet walls and mechanical screens typically provide noise attenuation, this analysis conservatively models all rooftops as flat, with no features to obstruct noise propagation. Additionally, it was conservatively assumed that the air handling unit would be continuously operated at maximum capacity.

The project would include a solid 5-foot wall along the southern project site boundary, a 9-foot solid wall along a portion of the eastern fire access lane, and a 6-foot solid wall along a portion of the northern project site boundary. Additionally, the project would include a solid enclosure around service yard equipment and a concrete cast-in-place wall enclosure around the cooling tower. The height of these enclosure walls would be based on the final generator and cooling tower selection. Modeling assumes enclosure walls would extend at least 3 feet above the shielded noise source; thus, the service yard enclosure wall was modeled as 7-feet tall and the cooling tower enclosure wall was modeled as 21-feet tall.

Anticipated noise levels associated with the proposed standby generator, cooling tower, loading operations, and air handlers were modeled at a series of specific receiver locations along the project site boundary and property lines and noise ground-floor contours were generated. Table 3 summarizes the projected noise levels at the modeled receivers.

Table 3 On-site Generated Noise Levels		
Receiver	Description	Noise Levels [dB(A) $L_{eq}$ ]
1	Northern Project Site Boundary / 9779 Towne Centre Drive	60
2		74
3		62
4	West of Project Site Boundary / 4535 Towne Centre Court	52
5		50
6	Southern Project Site Boundary / 9689 Towne Centre Drive	55
dB(A) $L_{eq}$ = 1-hour equivalent A-weighted decibels.		

As shown, the project is anticipated to generate noise levels from 50 to 74 dB(A)  $L_{eq}$  at the property lines of the nearest industrial properties. As shown, noise levels would not exceed the applicable noise level limit of 75 dB(A)  $L_{eq}$  at any property line. Therefore, on-site generated noise would

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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comply with the City Noise Abatement and Control Ordinance. Impacts would be less than significant.

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

The project may expose people to groundborne vibrations or noise levels during construction. Construction activities would be required to comply with the City Noise Abatement and Control Ordinance requirements, which allow for loud construction noise between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday, and on Columbus Day and Presidents Day. However, construction noise and vibration would be temporary and associated only with heavy-duty construction equipment. Construction vibration potential for building damage is assessed in terms of peak particle velocity (PPV) typically in units of inches per second (in/sec). Typically, the vibration threshold level for human annoyance and structural damage is 0.1 in/sec PPV and 0.2 PPV (Caltrans, 2002). Groundborne vibration from typical construction activities is not typically noticeable in buildings that are farther than 25 feet from the source. No existing building would be located closer than 25 feet from construction activity, as adjacent structures are set back from property lines at least this distance, providing adequate separation. Furthermore, construction would be prohibited during evening hours (7:00 p.m. to 7:00 a.m.) in accordance with City requirements and use of vibration-inducing construction equipment such as pile drivers are not anticipated. Thus, impacts related to ground borne vibration or noise would be less than significant.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

#### Ambient Noise Levels Increases

The project would generate an additional 452 ADT and would thereby increase traffic noise levels along nearby roadways. Noise level increases would be greatest nearest the project site, as this location would represent the greatest concentration of project-related traffic. The project would not substantially alter the vehicle classifications mix on local or regional roadways nor would it alter the speed on an existing roadway or create a new roadway. Thus, the primary factor affecting off-site noise levels would be increased traffic volumes.

The City's Significance Determination Thresholds state that if a project is currently at or exceeds the significance thresholds for traffic noise and noise levels result in less than a 3 dB(A) increase, the impact would not be considered significant. Algorithms and reference levels established in the Federal Highway Administration's (FHWA's) Traffic Noise Model were used to calculate noise levels along these roadways with and without project generated traffic. Existing traffic volumes and associated traffic noise levels as well volumes and traffic noise levels with the addition of project-generated traffic are summarized in Table 4. Traffic noise modeling is documented in Noise Measurements and Modeling for the 9775 Towne Centre Drive Project (RECON 2017b).

As shown in Table 4, the project would result in traffic noise increases over the existing condition of 1 dB or less along all affected roadway segments, which is not a perceptible increase in noise. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
Table 4 Traffic Noise Increases					
Intersection	Traffic Volume (ADT)		Noise Level (CNEL at 50 feet)		
	Existing	Existing Plus Project	Existing	Existing Plus Project	Increase
Genesee Avenue <i>Interstate 5 Northbound Ramps to Eastgate Mall</i>	29,537	29,582	73	73	<1
Eastgate Mall <i>Genesee Avenue to Towne Centre Drive</i>	14,318	14,472	69	69	<1
<i>Towne Centre Drive to Judicial Drive</i>	13,594	13,680	69	69	<1
Towne Centre Drive <i>North of Eastgate Mall</i>	10,074	10,499	67	68	1
<i>Eastgate Mall to Executive Drive</i>	12,565	12,750	66	66	<1
<i>Executive Drive to La Jolla Village Drive</i>	18,374	18,519	68	68	<1
La Jolla Village Drive <i>East of Towne Centre Drive</i>	61,681	61,812	76	77	1
Source: Urban Systems Associates 2017					

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

☐
☐
☒
☐

Construction activities would generate temporary and periodic increases in ambient noise levels within the project vicinity. Construction would generally occur between 7:00 a.m. and 7:00 p.m. on weekdays. As discussed in Section XII(a), construction noise levels would be estimated to reach 55 dB(A)  $L_{eq(12h)}$  at the property lines of the nearest residentially zoned property. While construction may be heard over other noise sources in the area, the exposure would be temporary and would not exceed the applicable regulation of 75 dB(A)  $L_{eq(12h)}$  at the nearest property line of a residential use. Therefore, while temporary or periodic increases in ambient noise levels may be heard by local residents, short-term noise level increases from construction activities would be less than significant.

- e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the area to excessive noise levels?

☐
☐
☒
☐

The project site is located within the Airport Influence Area of the MCAS Miramar Airport and is, therefore, subject to the land use policies within the MCAS Miramar ALUCP. According to the ALUCP, R&D facilities are compatible with aircraft noise levels up to 70 CNEL and conditionally compatible with noise levels up to 80 CNEL. The project site is located within the 60 CNEL noise contour for MCAS Miramar. As such, aircraft noise levels generated from MCAS Miramar would not exceed the applicable compatibility criteria of 70 CNEL as identified in the ALUCP, resulting in a less than significant impact.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

XIII. POPULATION AND HOUSING – Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project would not directly induce substantial population growth, as the project involves the demolition and construction of a new scientific research facility, and does not propose any new housing developments or development of a new business district. While the project would increase the building square footage in comparison to the existing conditions, thereby allowing for additional office space and occupants/employees, the additional scientific research space would accommodate employment space consistent with planned growth, and would not induce growth either directly or indirectly. The project site is currently developed, with access provided by existing roadway infrastructure. The project site is served by exiting water, sewer, and storm water infrastructure. Impacts related to population growth would be less than significant.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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There is no housing currently located on the project site; thus, no housing would be displaced. No impact would occur.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The site does not support housing or residents; thus, the project would not displace people. No impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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#### XIV. PUBLIC SERVICES

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

- i) Fire protection ☐ ☐ ☐ ☒

The project site is within the service area of Fire Station 35, located at 4285 Eastgate Mall in the University Community Plan area, and Fire Station 41, located at 4914 Carroll Canyon Road in the Mira Mesa Community Plan area. Additionally, there are several other fire stations in proximity to the project site that could respond to calls for emergency service as shown in Table 5.

Table 5 Project Area Fire Stations		
Fire Station	Station Address	Approximate Distance to Project Site (miles)
Station 35	4285 Eastgate Mall	<1
Station 41	4914 Carroll Canyon Road	3
Station 9	7870 Ardath Lane	4.7
Station 27	5064 Clairemont Drive	4.5

The project would involve the construction of a scientific research building, as well as parking and supporting infrastructure within an existing developed site. No additional fire protection services would be required as a result of the implementation of the project. As such, the project would not involve the provision or alteration of a new or existing fire protection facility. No impact would occur.

- ii) Police protection ☐ ☐ ☐ ☒

The project would involve the construction of a scientific research building, as well as parking and supporting infrastructure within an existing developed site. No additional police protection services would be required as a result of the implementation of the project. As such, the project would not involve the provision or alteration of a new or existing police protection facility. No impact would occur.

- iii) Schools ☐ ☐ ☐ ☒

The project would not have an impact on existing school facilities, as the project would not introduce a new population base that would require additional school facilities.

- iv) Parks ☐ ☐ ☐ ☒

The project would not have an impact on existing park facilities, as the project would not introduce a new population base that would require additional park facilities (see Section XIII(a)).

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

The project does not include any new or physically altered public facilities, and no additional public facilities or services would be required as a result of the implementation of the project. The project would not introduce a new population base that would require additional public facilities. Thus, no impact would occur.

#### XV. RECREATION

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

The project would not involve the provision or alteration of a new or existing park facility. The project would have no impact on existing recreation facilities, as the project would not introduce a new population base that would require additional recreation facilities. No impact would occur.

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

The project does not include recreational facilities or require the construction or expansion of recreational facilities, as the project would not introduce a substantial increase in the population base within the area. As such, the project would not have an adverse physical effect on the environment due to the construction of recreational facilities. No impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC – Would the project?				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Transportation Impact Analysis (TIA) was prepared for the 9775 Towne Centre Drive project (Urban Systems Associates 2017), which includes a Transportation Demand Management (TDM) plan, the results of which are summarized herein.

The transfer of square footage discussed in the project description, detailed here in terms of average daily trips (ADT), would result in an ADT transfer within Subarea 12, as well as from Subarea 11 to Subarea 12, to the project site (Lot 6a). Specifically, the project would transfer a total of 151 ADT within Subarea 12 from lots 3A, 3B, and 3D to the project site. In addition, the Community Plan would be amended to transfer 61 ADT from Subarea 11 to Subarea 12, Lot 6A. In total, 212 ADT would be transferred, which is equivalent to 26,513 square feet of Scientific Research uses. With the existing 100,000 square feet of entitled Scientific Research uses on the project site, the total of existing and transferred square footage would be 126,500 square feet. The transfer and receiving sites are all along the same road and the only outlet from the Subarea 11 lot is along Towne Centre Drive through Subarea 12. The project would also implement TDM measures targeting a reduction in peak hour trip generation. However, to provide a conservative analysis, no ADT reductions from TDM measures were assumed in the project's trip generation calculations.

The project is expected to generate 1,252 ADT, which is a net increase of 452 ADT from the existing conditions. The TIA evaluated seven street segments and six intersections. As shown in Table 6, the existing level of service (LOS) of each street segment within the study areas is as follows:

- Genesee Avenue, from Interstate 5 northbound ramps to Eastgate Mall: LOS B
- Eastgate Mall, from Genesee Avenue to Towne Centre Drive: LOS C
- Eastgate Mall, from Towne Centre Drive to Judicial Drive: LOS A
- Towne Centre Drive, North of Eastgate Mall: LOS A
- Towne Centre Drive, from Eastgate Mall to Executive Drive: LOS A
- Towne Centre Drive, from Executive Drive to La Jolla Village Drive: LOS B
- La Jolla Village Drive, East of Towne Centre Drive: LOS C

Currently, all street segments within the project study area operate at an acceptable LOS C or better. As shown in Table 6, when project traffic is added to existing traffic, all street segments are anticipated to continue to operate at acceptable levels of service in the existing plus project scenario.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The existing LOS (AM/PM) of each intersection within the study area is shown in Table 7 and described below:

- Eastgate Mall at Genesee Avenue: LOS D/LOS D
- Towne Centre Drive at Eastgate Mall: LOS C/LOS C
- Towne Centre Drive at Executive Drive: LOS C/LOS C
- Towne Centre Drive at La Jolla Village Drive: LOS C/LOS C
- I-805 southbound ramps at La Jolla Village Drive: LOS D/LOS D
- I-805 northbound ramps at La Jolla Village Drive: LOS C/LOS C

Currently, all intersections within the project study area operate at an acceptable LOS D or better. When project traffic is added to existing traffic, all intersections are anticipated to continue to operate at acceptable levels of service in the existing plus project scenario as detailed in Table 7 and summarized below:

- Eastgate Mall at Genesee Avenue: LOS D/LOS D
- Towne Centre Drive at Eastgate Mall: LOS C/LOS D
- Towne Centre Drive at Executive Drive: LOS C/LOS C
- Towne Centre Drive at La Jolla Village Drive: LOS C/LOS D
- I-805 southbound ramps at La Jolla Village Drive: LOS D/LOS D
- I-805 northbound ramps at La Jolla Village Drive: LOS C/LOS D

The project would increase delays at all intersections; however, these increases would not lead to a decrease in LOS to unacceptable levels (LOS E or F) that would result in a significant impact under the City's Significance Threshold. Based on the results of the existing plus project analysis (shown in Table 6 and 7), all street segments and intersections are anticipated to operate at acceptable levels of service, resulting in a less than significant impact.

**Table 6**  
**Existing and Existing with Project for Street Segments**

Road	Segment	Capacity	Class.	Existing Count	Existing 9775 Building	Adjusted Existing			Project	Existing + Project			Δ V/C	Significant Impact?
				Volume	Volume	LOS	Volume	V/C	Volume	LOS	Volume	V/C		
Genesee Avenue	I-5 NB Ramps to Eastgate Mall	60,000	6-PA	29,457	80	B	29,537	0.49	45	B	29,582	0.49	0.001	<b>No</b>
Eastgate Mall	Genesee Avenue to Towne Centre Drive	30,000	4-C	14,046	272	C	14,318	0.48	154	C	14,472	0.48	0.005	<b>No</b>
	Towne Centre Drive to Judicial Drive	40,000	4-M	13,442	152	A	13,594	0.34	86	A	13,680	0.34	0.002	<b>No</b>
Towne Centre Drive	North of Eastgate Mall	40,000	4-M	9,322	752	A	10,074	0.25	425	A	10,499	0.26	0.011	<b>No</b>
	Eastgate Mall to Executive Drive	40,000	4-M	12,237	328	A	12,565	0.31	185	A	12,750	0.32	0.005	<b>No</b>
	Executive Drive to La Jolla Village Drive	40,000	4-M	18,118	256	B	18,374	0.46	145	B	18,519	0.46	0.004	<b>No</b>
La Jolla Village Drive	East of Towne Centre Drive	80,000	8-PA	61,449	232	C	61,681	0.77	131	C	61,812	0.77	0.002	<b>No</b>

SOURCE: Urban System Associates 2017

Class. = Classification; LOS = level of service; V/C = volume to capacity; NB = northbound

**Table 7**  
**Existing and Existing With Project for Intersections**

#	Intersection	Existing				Existing + Project							
		AM Peak Hour		PM Peak Hour		AM Peak Hour		Δ	Significant Impact?	PM Peak Hour		Δ	Significant Impact?
		Delay	LOS	Delay	LOS	Delay	LOS			Delay	LOS		
1	Eastgate Mall at Genesee Avenue	41.1	D	39.9	D	41.3	D	0.2	<b>No</b>	40.0	D	0.1	<b>No</b>
2	Towne Centre Drive at Eastgate Mall	31.9	C	34.9	C	33.1	C	1.2	<b>No</b>	35.8	D	0.9	<b>No</b>
3	Towne Centre Drive at Executive Drive	25.3	C	29.8	C	25.4	C	0.1	<b>No</b>	29.9	C	0.1	<b>No</b>
4	Towne Centre Drive at La Jolla Village Drive	34.6	C	40.4	C	34.7	C	0.1	<b>No</b>	40.8	D	0.4	<b>No</b>
5	I-805 SB Ramps at La Jolla Village Drive	50.8	D	36.8	D	51.7	D	0.9	<b>No</b>	36.9	D	0.1	<b>No</b>
6	I-805 NB Ramps at La Jolla Village Drive	27.4	C	38.2	C	28.1	C	0.7	<b>No</b>	38.3	D	0.1	<b>No</b>

SOURCE: Urban System Associates 2017

LOS = level of service; SB = southbound; NB = northbound

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Near Term traffic analysis evaluates traffic impacts based on the existing plus other projects that were approved, pending approval, or planned in the area and assumed to be constructed and occupied at the project's opening day (late 2018). The project's traffic was then added to the Near Term conditions to determine the Near Term With Project conditions. The Near Term With and Without Project conditions for street segments are as follows (refer also to Table 8):

- Genesee Avenue, from Interstate 5 northbound ramps to Eastgate Mall: LOS B
- Eastgate Mall, from Genesee Avenue to Towne Centre Drive: LOS C
- Eastgate Mall, from Towne Centre Drive to Judicial Drive: LOS A
- Towne Centre Drive, North of Eastgate Mall: LOS A
- Towne Centre Drive, from Eastgate Mall to Executive Drive: LOS A
- Towne Centre Drive, from Executive Drive to La Jolla Village Drive: LOS B
- La Jolla Village Drive, East of Towne Centre Drive: LOS D

The Near Term With and Without Project LOS (AM/PM) conditions for intersections are as follows (refer also to Table 9):

- Eastgate Mall at Genesee Avenue: LOS D/LOS D
- Towne Centre Drive at Eastgate Mall: LOS D/LOS D
- Towne Centre Drive at Executive Drive: LOS C/LOS D
- Towne Centre Drive at La Jolla Village Drive: LOS D/LOS D
- I-805 southbound ramps at La Jolla Village Drive: **LOS F/LOS F**
- I-805 northbound ramps at La Jolla Village Drive: LOS D/LOS D

Based on the results of the Near Term With and Without Project analysis, all street segments are anticipated to operate at acceptable levels of service, resulting in a less than significant impact (refer to Table 8). In addition, the Near Term plus Project scenario shows that all intersections are projected to operate at acceptable levels of service, except for I-805 southbound ramps at La Jolla Village Drive during the AM and PM Peak Hour conditions (refer to Table 9). This intersection would operate at LOS F both with and without the addition of project-related traffic. The additional delay at this intersection resulting from implementation of the project is 0.4 seconds in the AM peak hour and 0.3 seconds in the PM peak hour, which is below the allowable increase in delay of one second per the City's Significance Determination Threshold for determining a significant intersection impact. Thus, impacts would be less than significant.

**Table 8**  
**Near Term With and Without Project Street Segment Significance**

Road	Segment	Capacity	Class.	Near Term			Near Term + Project			Δ V/C	Significant Impact?
				LOS	Volume	V/C	LOS	Volume	V/C		
Genesee Ave	I-5 NB Ramps to Eastgate Mall	60,000	6-PA	B	33,783	0.56	B	33,828	0.56	0.001	<b>No</b>
Eastgate Mall	Genesee Avenue to Towne Centre Drive	30,000	4-C	C	14,843	0.49	C	14,997	0.50	0.005	<b>No</b>
	Towne Centre Drive to Judicial Drive	40,000	4-M	A	13,939	0.35	A	14,025	0.35	0.002	<b>No</b>
Towne Centre Drive	North of Eastgate Mall	40,000	4-M	A	10,343	0.26	A	10,768	0.27	0.011	<b>No</b>
	Eastgate Mall to Executive Drive	40,000	4-M	A	13,083	0.33	A	13,268	0.33	0.005	<b>No</b>
	Executive Drive to La Jolla Village Drive	40,000	4-M	B	18,704	0.47	B	18,849	0.47	0.004	<b>No</b>
La Jolla Village Drive	East of Towne Centre Drive	80,000	8-PA	D	71,641	0.90	D	71,772	0.90	0.002	<b>No</b>

SOURCE: Urban System Associates 2017

Class. = Classification; LOS = level of service; V/C = volume to capacity; Δ V/C = change in volume to capacity

**Table 9**  
**Near Term With and Without Project Intersection Comparison**

#	Intersection	Near Term				Near Term + Project							
		AM Peak Hour		PM Peak Hour		AM Peak Hour		Δ	Significant Impact?	PM Peak Hour		Δ	Significant Impact?
		Delay	LOS	Delay	LOS	Delay	LOS			Delay	LOS		
1	Eastgate Mall at Genesee Avenue	46.4	D	44.3	D	46.9	D	0.5	<b>No</b>	44.5	D	0.2	<b>No</b>
2	Towne Centre Drive at Eastgate Mall	35.5	D	41.8	D	36.9	D	1.4	<b>No</b>	43.0	D	1.2	<b>No</b>
3	Towne Centre Drive at Executive Drive	29.6	C	50.8	D	29.7	C	0.1	<b>No</b>	52.2	D	1.4	<b>No</b>
4	Towne Centre Drive at La Jolla Village Drive	43.9	D	50.6	D	44.5	D	0.6	<b>No</b>	51.6	D	1.0	<b>No</b>
5	I-805 SB Ramps at La Jolla Village Drive	124.0	<b>F</b>	81.5	<b>F</b>	124.4	<b>F</b>	0.4	<b>No</b>	81.8	<b>F</b>	0.3	<b>No</b>
6	I-805 NB Ramps at La Jolla Village Drive	39.6	D	41.3	D	40.0	D	0.4	<b>No</b>	41.6	D	0.3	<b>No</b>

SOURCE: Urban System Associates 2017

LOS = level of service; Δ = change; SB = southbound; NB = northbound



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Horizon Year 2035 With and Without Project traffic conditions analysis evaluates traffic impacts based on traffic volumes taken from the SANDAG Series 12 Year 2035 traffic models. The project land uses were inserted in the traffic model to obtain a forecast of traffic conditions in the future with the project. The Horizon Year 2035 With and Without Project conditions for street segments are as follows (refer also to Table 10):

- Genesee Avenue, from Interstate 5 northbound ramps to Eastgate Mall: LOS C
- Eastgate Mall, from Genesee Avenue to Towne Centre Drive: LOS D
- Eastgate Mall, from Towne Centre Drive to Judicial Drive: LOS A
- Towne Centre Drive, North of Eastgate Mall: LOS A
- Towne Centre Drive, from Eastgate Mall to Executive Drive: LOS C
- Towne Centre Drive, from Executive Drive to La Jolla Village Drive: LOS D
- La Jolla Village Drive, East of Towne Centre Drive: LOS C

The Horizon Year 2035 With and Without Project analysis for AM and PM (AM/PM) intersection operations are identified below with bold identifying unacceptable LOS in the Horizon Year (refer also to Table 11):

- Eastgate Mall at Genesee Avenue: **LOS E**/LOS D
- Towne Centre Drive at Eastgate Mall: **LOS E**/LOS D
- Towne Centre Drive at Executive Drive: **LOS E/LOS E**
- Towne Centre Drive at La Jolla Village Drive: **LOS E/LOS E**
- I-805 SB Ramps at La Jolla Village Drive: **LOS F**/LOS C
- I-805 NB Ramps at La Jolla Village Drive: LOS C/LOS C

Based on the results of the Horizon Year 2035 Project analysis, all street segments are anticipated to operate at acceptable levels of service, resulting in a less than significant impact (refer to Table 10). In addition, in both the existing condition and the horizon year 2035 condition, five intersections would operate at unacceptable levels of service in the AM peak hour and two intersections would operate at unacceptable levels of service in the PM peak hour. Although these intersections are projected to operate at an unacceptable level of service in the horizon year, this would occur both with and without the addition of project-related traffic and the project's contribution to the delay for each intersection operating at LOS E or F are below the allowable increase in delay per the City's Significance Thresholds, which allows a 2-second delay for LOS E intersections and a 1-second delay for LOS F intersections (refer to Table 11). Therefore, the project would not result in a cumulatively considerable contribution to the deficient levels of service identified at the study area intersections in horizon year 2035.

Table 10 Horizon Year 2035 With and Without Project Street Segment Significance											
Road	Segment	Capacity	Class.	Year 2035			Year 2035 + Project			Δ V/C	Significant Impact?
				LOS	Volume	V/C	LOS	Volume	V/C		
Genesee Ave	I-5 NB Ramps to Eastgate Mall	60,000	6-PA	C	36,655	0.61	C	36,700	0.61	0.001	<b>No</b>
Eastgate Mall	Genesee Avenue to Towne Centre Drive	30,000	4-C	D	20,646	0.69	D	20,800	0.69	0.005	<b>No</b>
	Towne Centre Drive to Judicial Drive	40,000	4-M	A	14,300	0.36	A	14,386	0.36	0.002	<b>No</b>
Towne Centre Drive	North of Eastgate Mall	40,000	4-M	A	14,375	0.36	A	14,800	0.37	0.011	<b>No</b>
	Eastgate Mall to Executive Drive	40,000	4-M	C	29,015	0.73	C	29,200	0.73	0.005	<b>No</b>
	Executive Drive to La Jolla Village Drive	40,000	4-M	D	33,655	0.84	D	33,800	0.85	0.004	<b>No</b>
La Jolla Village Drive	East of Towne Centre Drive	80,000	8-PA	C	69,500	0.87	C	69,631	0.87	0.002	<b>No</b>
SOURCE: Urban System Associates 2017											
Class. = Classification; LOS = level of service; V/C = volume to capacity; Δ V/C = change in volume to capacity; NB = northbound											

Table 11 Horizon Year 2035 With and Without Project Intersection Comparison													
#	Intersection	Year 2035				Year 2035 + Project							
		AM Peak Hour		PM Peak Hour		AM Peak Hour		Δ	Significant Impact?	PM Peak Hour		Δ	Significant Impact?
		Delay	LOS	Delay	LOS	Delay	LOS			Delay	LOS		
1	Eastgate Mall at Genesee Avenue	56.8	<b>E</b>	45.7	D	57.8	<b>E</b>	1.0	<b>No</b>	45.9	D	0.2	<b>No</b>
2	Towne Centre Drive at Eastgate Mall	55.4	<b>E</b>	51.7	D	56.8	<b>E</b>	1.4	<b>No</b>	54.8	D	3.1	<b>No</b>
3	Towne Centre Drive at Executive Drive	56.2	<b>E</b>	60.4	<b>E</b>	56.6	<b>E</b>	0.4	<b>No</b>	61.3	<b>E</b>	0.9	<b>No</b>
4	Towne Centre Drive at La Jolla Village Drive	65.1	<b>E</b>	68.1	<b>E</b>	66.3	<b>E</b>	1.2	<b>No</b>	70.0	<b>E</b>	1.9	<b>No</b>
5	I-805 SB Ramps at La Jolla Village Drive	93.4	<b>F</b>	28.6	C	94.1	<b>F</b>	0.7	<b>No</b>	28.6	C	0.0	<b>No</b>
6	I-805 NB Ramps at La Jolla Village Drive	31.5	C	31.5	C	34.7	C	3.2	<b>No</b>	33.2	C	1.7	<b>No</b>
SOURCE: Urban System Associates 2017													
LOS = level of service; Δ = change; SB = southbound; NB = northbound													

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The analysis discussed above shows that no direct or cumulative significant impacts would occur as a result of the project for street segments and intersections. Impacts would be less than significant.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Refer to XVI(a). Impacts would be less than significant.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is within the MCAS Miramar ALUCP, and would therefore be subject to the ALUCP regulations. The proposed structure would be four stories high, which would be within the height limits established by 14 Code of Federal Regulations Sections 77.17, Obstruction Standards, resulting in no impact.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project does not propose any alterations to the existing circulation network providing access to the project site. Within the project site, the roadway network would be revised as compared to what currently exists, but would not include any design features that may generate hazardous roadway conditions, resulting in no impact.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site contains existing fire and emergency access infrastructures that traverse through the project site. The project would include additional fire access roads that would provide vehicular access around the proposed project. All fire access roads would be capable of supporting a 75,000-pound load, and all access roads would be built in conformance with the California Fire Code section 503.2.1 and Appendix D, thereby ensuring that the project would have adequate emergency access. No impacts would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project would not conflict with adopted policies, plans, or programs regarding public transit. The project would implement a TDM Plan, which is a strategy designed to reduce single occupant vehicle trips during the AM and PM peak weekday traffic hours. The TDM measures that would be incorporated into the project include partial transit subsidies/parking cash-out of \$30 per month or \$360 per year; bicycle subsidies/parking cash out of \$30 per month or \$360 per year; a telework program; flexible or alternative work hours; on-site bike sharing; on-site food and beverage stations; last-mile transportation; and participation in SANDAG iCommute. Trip reductions due to TDM measures were not assumed in the intersection and street segment analysis to provide a conservative analysis.

In addition, the following TDM measures would be implemented: bike and walk facilities; preferred parking for carpoolers; participation in the Guaranteed-Ride-Home program; a compressed workweek; the use of a designated TDM administrator; and provision of a bicycle repair station on-site. A TDM Monitoring and Reporting program would be prepared every year for a five-year period to ensure that TDM strategies are adequately implemented and maintained. Thus, the project would be consistent with adopted policies, plans, and programs regarding public transit, bicycle, and pedestrian facilities. No impact would occur.

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

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not cause a substantial adverse effect to tribal cultural resources, as there are no recorded sites listed or sites eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined by the Public Resources Code. No impact would result.

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

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego notified the the lipay Nation of Santa Isabel Indians and the Jamul Indian Village, both traditionally and culturally affiliated with the project area. These tribes were notified via email on July 7, 2017 with both Native American Tribes responding within the 30-day formal notification period requesting consultation. Consultation took place on August 11, 2017, with the Native American tribes concurring with the staff's determination of no further evaluation with respect to cultural resources (archaeology) monitoring with a Native American monitor present during ground-disturbing activities. The consultation process was therefore concluded.

XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:

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

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

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

The project would not require the construction of new water or wastewater treatment facilities that could cause significant environmental effects. All private water facilities on-site would be designed and constructed in accordance with the requirements of the California Uniform Plumbing Code and would connect to existing water lines in adjacent roadways. All public water facilities including services and meters would be designed and constructed in accordance with current City Water Facility Design Guidelines and regulations.

For wastewater treatment, the project would construct a new private sewer lateral on-site, and connect into the existing 10-inch polyvinyl chloride (PVC) sewer main along Towne Centre Drive. The San Diego Metropolitan Sewerage System provides regional wastewater collection, treatment, and disposal services for the City. The Point Loma Wastewater Treatment Plant treats wastewater from residential, commercial, and industrial sources in the city of San Diego. No existing capacity issues have been identified to meet the population forecast demands. Only lateral connections and on-site realignment of the sewer main would be required for the project; no line extensions would be necessary.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities that would cause significant environmental effects. Existing water and sewer facilities are currently available to the existing development. The project proposes the demolition of the existing facility and the construction of a new four-story scientific research facility; however, improvements would be limited to the capping of existing water and sewer pipe connections on-site and the relocation of water and sewer lines within the project site. Sewer and water capacity fees would be due and collected at the issuance of building permits. Thus, impacts would be less than significant.

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

Refer to IX(c). Impacts would be less than significant.

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

The 2015 City Urban Water Management Plan (UWMP) serves as the water resources planning document for the City's residents, businesses, interest groups, and public officials. The UWMP assess the current and future water supply and needs for the City. Implementation of the project would not result in new or expanded water entitlements from the water service provider, as the project is consistent with existing demand projections contained in the UWMP (which are based on the allowed land uses for the project site, in this case, Scientific Research). The Public Utilities Department local water supply is generated from recycled water, local surface supply, and groundwater, which accounts for approximately 20 percent of the total water requirements for the City. The City purchases water from the San Diego County Water Authority to make up the difference between total water demands and local supplies (City of San Diego 2015). Therefore, the project would not require new or expanded entitlements.

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

Refer to XVIII (a) and (b). A less than significant impact would occur.

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

Refer to Section XVIII(g).

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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With implementation of the Waste Management Plan (WMP) and applicable solid waste regulations, potential direct and cumulative impacts would be less than significant.

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

The applicable regulations related to solid waste disposal include: Assembly Bill (AB) 341, which sets a policy goal of 75 percent waste diversion by the year 2020; AB 1826, which requires businesses in California to arrange for recycling services for organic waste; the City's Recycling Ordinance, which requires on-site recyclable collection for residential and commercial uses; the City's Refuse and Recyclable Materials Storage Regulations indicates the minimum exterior refuse and recyclable material storage areas required at residential and commercial properties; the Construction and Demolition (C&D) Debris Deposit Ordinance requires that the majority of construction, demolition, and remodeling projects requiring building, combination, or demolition permits pay a refundable C&D Debris Recycling Deposit and divert at least 50 percent of their waste by recycling, reusing, or donating reusable materials; and the City's Zero Waste Objective, which implements the 75 percent diversion of waste target from landfills by the year 2020 and zero waste by 2040.

#### Demolition, Grading, and Construction Waste

Based on the WMP prepared by Latitude 33 (Latitude 33 2017a), the project would require the demolition and removal of 3,540 tons of asphalt and 1,434 tons of existing building and landscaping materials. Construction of the project is estimated to generate 248 tons of waste, for a total demolition and construction waste generation of 5,222 tons. Grading associated with the proposed project would result in the net export of 41,000 cubic yards of soil. Based on the City Environmental Services Department C&D Debris Conversion Rate table, export soil weighs approximately 1.3 tons/unit, which equates to 53,300 tons. All exported soil would be recycled using the City Clean Fill Dirt Program or the Hanson Aggregates West – Miramar facility.

Table 12 summarizes the amount of waste estimated to be generated and diverted by each phase of the proposed project. Of the 5,222 tons estimated to be produced from demolition and construction, 4,574 tons would be diverted, primarily through source separation. This would result in 92 percent of the waste material from demolition and construction being diverted from the landfill for reuse. In addition, 100 percent of the soil would be diverted for reuse, for an overall 99 percent diversion rate.

Table 12 Total Waste Generated, Diverted, and Disposed of By Phase			
Phase	Tons Generated	Tons Diverted	Tons Disposed
Demolition	4,974	4,574 (92%)	400 (8%)
Grading	53,300	53,300 (100%)	0 (0%)
Construction	248	185.75 (74.9%)	62.25 (25.1%)
<b>Total</b>	<b>58,522</b>	<b>58,059.75 (99.2%)</b>	<b>462.25 (0.8%)</b>

#### Operational Waste

The operational waste generated by the proposed project is estimated to amount to a total of 280.5 tons of waste per year. Table 13 summarizes the estimated occupancy phase waste generation.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table 13 Occupancy Phase Annual Waste Generation			
Land Use	Amount (square feet)	Waste Generation Rate (tons per year per square foot)	Waste Generated (tons)
Industrial Office	165,000	0.0017	280.5

The project would include 165,000 square feet of habitable building space for non-residential uses, generating approximately 280.5 tons of waste per year; and would be required to provide a minimum of 336 square feet of exterior refuse area and the same amount of recyclable material storage area (total of 672 square feet). The applicant/applicant's successor in interest would be required to implement ongoing waste reduction measures to ensure the operation of the project complies with City ordinances, which is expected to provide a minimum recycling service volume of 40 percent for large complexes. Therefore, waste anticipated to be diverted during the operational phase of the project would be approximately 112.2 tons per year, leaving 168.3 tons destined for disposal. This would exceed the City's threshold of 60 tons of waste or more. However, with implementation of the strategies outlined in the WMP, which the City's Environmental Services Department has determined are adequate to avoid significant impacts during the operational phase of the project and compliance with all applicable City ordinances, solid waste impacts would be reduced to below a level of significance regarding collection, diversion, and disposal of waste generated from C&D, grading, and occupancy, resulting in a less than significant impact. For additional details regarding the WMP, refer to the WMP available at the City Development Services Department.

#### XIX. MANDATORY FINDINGS OF SIGNIFICANCE

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

☐
☒
☐
☐

The project would disturb approximately 3.25 acres of previously developed and disturbed land, consisting of an existing building footprint, landscaping, and hardscaping. The project footprint would not disturb any area containing wildlife habitat that has not previously been addressed. As such, the project would not reduce the habitat of a fish or wildlife species eliminate a plant or animal community, or cause a fish or wildlife population to drop below a self-sustaining level.

The project site is located adjacent to the closest MHPA-designated area. Although the project site is in proximity of the MHPA, the project would implement design measures to ensure the project conforms with the MHPA Land Use Adjacency Guidelines (Section 1.4.3). The project site is not part of any wildlife corridor for rare or endangered species and would, therefore, not restrict the range of such species.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project would have the potential to impact paleontological resources during grading and would implement paleontological monitoring mitigation during grading to reduce impacts to less than significant.

In addition, the project would comply with all applicable statutory regulations that work to protect the environment, such as storm water and runoff regulations under the San Diego Regional municipal separate storm sewer systems permit, and would not disturb any native habitat areas or otherwise lead to the degradation of the surrounding environment, resulting in no impact.

b) Does the project have impacts that are individually limited but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As documented in this Initial Study, the project would result in less than significant impacts for all issue areas with the exception paleontological resources as the site could disturb bedrock with the potential to contain paleontological resources. Mitigation measures have been proposed to reduce impacts to less than significant, which would also ensure the project does not contribute to a cumulative impact to paleontological resources. The project would comply with the City's CAP Consistency Checklist to ensure cumulative GHG emissions are less than significant. Cumulative waste impacts related to solid waste would be reduced to less than cumulatively considerable with implementation of the project-specific waste management plan. Additionally, all horizon year transportation impacts were below applicable significance thresholds for a cumulative impact. No other potentially significant cumulative impacts have been identified. As such, the project is not anticipated to contribute to potentially significant cumulative environmental impacts.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

As discussed throughout this document, no hazardous conditions on the project site or in the surrounding area were identified that could adversely affect human beings. It is not anticipated that demolition or construction activities would create conditions that would significantly directly or indirectly impact human beings. Redevelopment of the project site would comply with all state and city regulations that would ensure the building is safe and designed to protect future occupants. The project would not result in any substantial adverse effects on human beings directly or indirectly.

**INITIAL STUDY CHECKLIST  
REFERENCES**

**I. Aesthetics / Neighborhood Character**

- ☒ City of San Diego General Plan
- ☒ University Community Plan

**II. Agricultural Resources & Forest Resources**

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

**III. Air Quality**

- ☐ California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
- ☒ Regional Air Quality Strategy (RAQS) – APCD
- ☒ Site Specific Report:
  - Emission Modeling Results for 9775 Towne Centre Drive Project, San Diego, CA, RECON Environmental, Inc., December 21, 2017 (RECON 2017a)

**IV. Biology**

- ☒ City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
- ☐ City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
- ☒ City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
- ☐ Community Plan - Resource Element
- ☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001
- ☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California," January 2001
- ☒ City of San Diego Land Development Code Biology Guidelines
- ☒ Site Specific Report:
  - Biological Resource Report for the 9775 Towne Centre Drive Project, San Diego, California, RECON Environmental Inc., January 9, 2018 (RECON 2018)



**V. Cultural Resources (includes Historical Resources)**

- ☒ City of San Diego Historical Resources Guidelines
- ☐ City of San Diego Archaeology Library
- ☐ Historical Resources Board List
- ☐ Community Historical Survey:
- ☒ Site Specific Report:
  - CHRIS data search by qualified archeological City staff.
- ☒ Site Specific Report:
  - Geotechnical Investigation, 9775 Towne Centre Drive, San Diego, CA, GEOCON, Inc., December 16, 2016 (GEOCON 2016).

**VI. Geology/Soils**

- ☐ City of San Diego Seismic Safety Study
- ☐ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975
- ☒ Site Specific Report:
  - Geotechnical Investigation, 9775 Towne Centre Drive, San Diego, CA, GEOCON, Inc., December 16, 2016 (GEOCON 2016).

**VII. Greenhouse Gas Emissions**

- ☒ Site Specific Report:
  - 9775 Towne Centre Drive CAP Consistency Checklist, Latitude 33 Planning and Engineering, August 9, 2017 (Latitude 33 2017b)

**VIII. Hazards and Hazardous Materials**

- ☐ San Diego County Hazardous Materials Environmental Assessment Listing
- ☐ San Diego County Hazardous Materials Management Division
- ☐ FAA Determination
- ☐ State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized
- ☒ MCAS Miramar Airport Land Use Compatibility Plan
- ☒ California Department of Toxic Substances Control EnviroStor Database
- ☒ California State Water Resources Control Board GeoTracker Database
- ☐ Site Specific Report:

**IX. Hydrology/Water Quality**

- ☒ Flood Insurance Rate Map (FIRM)
- ☒ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
- ☐ Clean Water Act Section 303(b) list, [http://www.swrcb.ca.gov/tmdl/303d\\_lists.html](http://www.swrcb.ca.gov/tmdl/303d_lists.html)
- ☒ Site Specific Report:
  - Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) for 9775 Towne Centre Drive, San Diego, CA, Latitude 33 Planning and Engineering, August 2017 (Latitude 33 2017c)
  - Drainage Study for 9775 Towne Centre Drive, San Diego, CA, Latitude 33 Planning and Engineering, August 2017 (Latitude 33 2017d)

**X. Land Use and Planning**

- ☒ City of San Diego General Plan
- ☒ University Community Plan
- ☒ MCAS Miramar Airport Land Use Compatibility Plan
- ☒ City of San Diego Zoning Maps
- ☐ FAA Determination
- ☐ Other Plans:

**XI. Mineral Resources**

- ☒ California Department of Conservation - Division of Mines and Geology, Mineral Land Classification
- ☒ Division of Mines and Geology, Special Report 153 - Significant Resources Maps
- ☐ Site Specific Report:

**XII. Noise**

- ☐ City of San Diego General Plan
- ☐ University Community Plan
- ☐ San Diego International Airport - Lindbergh Field CNEL Maps
- ☐ Brown Field Airport Master Plan CNEL Maps
- ☐ Montgomery Field CNEL Maps
- ☐ San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes
- ☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- ☒ Site Specific Report:
  - Noise Measurements and Modeling for the 9775 Towne Centre Drive Project, San Diego, CA, RECON Environmental, Inc., December 21, 2017 (RECON 2017b).

### **XIII. Paleontological Resources**

- ☒ City of San Diego Paleontological Guidelines
- ☒ Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996
- ☒ Site Specific Report:
  - Geotechnical Investigation, 9775 Towne Centre Drive, San Diego, CA, GEOCON, Inc., December 16, 2016 (GEOCON 2016).

### **XIV. Population / Housing**

- ☒ City of San Diego General Plan
- ☒ University Community Plan
- ☐ Series 13 Population Forecasts, SANDAG
- ☐ Other:

### **XV. Public Services**

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

### **XVI. Recreational Resources**

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

### **XVII. Transportation / Circulation**

- ☐ City of San Diego General Plan
- ☐ University Community Plan
- ☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- ☐ San Diego Region Weekday Traffic Volumes, SANDAG
- ☒ Site Specific Report:
  - Transportation Impact Analysis for 9775 Towne Centre Drive, Urban Systems Associates, Inc., November 16, 2017 (Urban Systems Associates 2017).

## **XVIII. Utilities**

- ☒ City of San Diego Urban Water Management Plan 2015
- ☐ Community Plan
- ☐ 2006 Waste Disposal and Diversion Findings for Selected Industry Groups. California Environmental Protection Agency, Integrated Waste Management Board. June.
- ☒ Site Specific Report:
  - Waste Management Plan for the 9775 Towne Centre Drive Project, San Diego, CA, Latitude 33 Planning Engineering, May 2017 (Latitude 33 2017a)

## **XIX. Water Conservation**

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

Revised: October 11, 2013



✱ Project Location

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FIGURE 1  
Regional Location



Image Source: NearMaps (flown June 2017)



0 Feet 200

Project Boundary

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FIGURE 2  
Project Location on Aerial Photograph



